

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JOSEPH HARDESTY, et al.	:	Case No. 1:16-CV-00298
Individually and on behalf of All	:	
Others Similarly Situated	:	Judge Matthew W. McFarland
	:	
Plaintiffs,	:	
	:	AFFIDAVIT OF JOSHUA M. SMITH,
v.	:	ESQ. IN SUPPORT OF JOINT
	:	MOTION TO APPROVE
THE KROGER CO., et al.	:	COLLECTIVE ACTION
	:	SETTLEMENT
Defendants.	:	

Now comes Joshua M. Smith, Esq., Co-Counsel for Representative Plaintiffs Joseph Hardesty, Madeline Hickey, Derek Chipman, and the 24 FLSA Collective Action Members (collectively, “Plaintiffs”), and for his Declaration in the matter of *Hardesty et al. v. The Kroger Co. et al.*, Case No. 1:16-cv-00298 (the “Lawsuit”) states the following:

1. I have been an associate attorney at Stagnaro, Saba & Patterson Co., L.P.A. for the last 8 years.
2. Throughout that time, I have represented multiple clients in labor and employment matters, including wage and hour disputes under the FLSA and Ohio law.
3. In the present Lawsuit, I have represented the 27 Plaintiffs as counsel of record since the date of filing, February 9, 2016, including the three Representative Plaintiffs. All 27 Plaintiffs submitted opt-in consent forms, which have been filed with the Court.
4. Sharon J. Sobers, a fellow associate of the firm with 36 years of experience, and Peter A. Saba, a shareholder of the firm with 30 years of experience, have also represented the Plaintiffs as counsel of record throughout this time period. Both Ms. Sobers and Mr. Saba have represented multiple clients in wage and hour disputes throughout their years of practice, including claims arising under the FLSA and Ohio law.
5. At certain times throughout the litigation, other attorneys and staff members have assisted in prosecuting the Plaintiff's claims, including Jeffrey G. Stagnaro (shareholder), Jeffrey M. Nye (partner), Matthew D. Soaper (associate attorney), and staff members Emma F. Paxton, Karen A. Cittadino, Haley N. Rubel, and Jessica K. Peterson.

6. All of the above attorneys and staff are competent, experienced, and provided valuable and efficient services to the Plaintiffs in prosecuting their claims for overtime compensation.
7. Since the Lawsuit began, the above attorneys and staff have expended significant time over a 7-year period prosecuting and assisting in the prosecution of the Plaintiffs' claims. This includes, but is in no way limited to, preliminary investigations, witness interviews, intra-office meetings, conducting legal research on various issues including under the FLSA and federal rules, preparing and filing pleadings, preparing for and attending mediation, communications with class members, certification briefing, dispositive motion briefing, substantial discovery (including 14 depositions and reviewing thousands of pages of documents produced in discovery), discretionary appeals, and trial preparation up to and including the date of settlement (March 11, 2022).
8. The attorneys and staff referenced contemporaneously tracked all of their time expended in prosecuting the Plaintiffs' claims, in increments of 1/10 of an hour. A true and accurate copy of the attorney/staff time report reflecting such hours expended on the Lawsuit is attached hereto as **Attachment 1**.
9. The total amount of hours expended by each of the above attorneys and staff are identified below:

Attorney Hours

- | | | |
|------------------------|---|--------------|
| a. Joshua M. Smith | - | ██████ hours |
| b. Sharon J. Sobers | - | ██████ hours |
| c. Peter A. Saba | - | ██████ hours |
| d. Matthew D. Soaper | - | ██████ hours |
| e. Jeffrey M. Nye | - | ██████ hours |
| f. Jeffrey G. Stagnaro | - | ██████ hours |

Staff Hours

- | | | |
|------------------------|---|--------------|
| g. Emma F. Paxton | - | ██████ hours |
| h. Jessica K. Peterson | - | ██████ hours |
| i. Haley N. Rubel | - | ██████ hours |
| j. Karen A. Cittadino | - | ██████ hours |

10. The above hours expended on the Litigation were billed at the following hourly rates:

Attorney Rates

- | | | |
|--------------------|---|---------------------------------------|
| a. Joshua M. Smith | - | ██████ / hour (2015 - 2017) |
| | | ██████ / hour (2018 - 2019) |
| | | ██████ / hour (2020) |
| | | ██████ / hour (Jan. 2021 – July 2021) |

■■■■■ / hour (Aug. 2021 – Jan. 2022)
 ■■■■■ / hour (Feb. 2022 – present)

b. Sharon J. Sobers - [REDACTED] / hour (2015 – 2020)
[REDACTED] / hour (Jan. 2021 – Jan. 2022)
[REDACTED] / hour (Feb. 2022 – present)

c. Peter A. Saba -  / hour (2015 – 2017)
 / hour (2018 – 2019)
 / hour (2020)
 / hour (2021)
 / hour (2022)

d. Jeffrey G. Stagnaro - [REDACTED] / hour (2022)

e. Jeffrey M. Nye - [REDACTED] / hour (2015 – 2017)
[REDACTED] / hour (2018 – 2019)

f. Matthew D. Soaper - [REDACTED] / hour (2021 – present)

Staff Rates

g. Emma F. Paxton - ██████████ / hour (2015–2017)

h. Karen A. Cittadino - [REDACTED] / hour (2018 – 2019)

i. Haley N. Rubel - [REDACTED] / hour (2019)
[REDACTED] / hour (2020)

j. Jessica K. Peterson - [REDACTED] / hour (2021)
[REDACTED] / hour (2022)

11. Based upon the above rates and hours expended, the total amount of fees expended on the Litigation is [REDACTED].

12. The above rates and hours expended are reasonable, and consistent with prevailing rates of those in the community for similar services by lawyers of reasonably comparable skill, experience, and reputation.

13. On March 11, 2022, following good faith, arm's length negotiations between Plaintiffs and Defendants, the parties reached a settlement agreement in the Lawsuit, after seven years of litigation and three days prior to a jury trial in this matter.

14. The formal Settlement Agreement reflects a total monetary amount of [REDACTED] covering (a) all individual payments to each Plaintiff (total of [REDACTED]); (b) a service

award to the Representative Plaintiffs (██████ each for total of ██████); and (c) a partial payment of Plaintiffs' Counsel's attorney fees and expenses (██████ in fees, and ██████ in expenses). The amount in fees is approximately ██████ of the amounts expended, well below the lodestar referenced above.

15. This settlement is fair, reasonable, and provides substantial relief to the Plaintiffs for the overtime amounts alleged to be owed to them. Since informing the Plaintiffs of the settlement and vacating of the trial, Plaintiffs' counsel has received no negative feedback regarding the settlement, and in fact the feedback received has been positive.
16. If forced to litigate this case further, the parties would likely engage in complex, costly, and protracted wrangling, including but not limited to conducting a 2-3 week trial, engaging in post-trial briefing, and potentially appealing any final judgment. On the other hand, the settlement provides a finality to this dispute at the present time.
17. The individual payments to each Plaintiff (totaling ██████) were calculated based upon a thorough review of documents produced by Defendants in this case, including, but not limited to, (i) salary amounts of each Plaintiff; (ii) work schedules indicating, generally, a ██████ hour workweek; (iii) detailed phone records/reports maintained by Kroger indicating various amounts of overtime work; (iv) security badge records indicating arrival times of Plaintiffs; and (v) Plaintiff testimony and/or anticipated testimony reflecting approximately ██████ hours of scheduled overtime, and ██████ additional hours of unscheduled overtime.
18. Based upon the above, Plaintiffs' counsel prepared a chart of damages which were presented to Defendants for purposes of settlement negotiations. A true and accurate copy of this chart is included in the settlement agreement, and also attached hereto as **Attachment 2**.
19. This chart calculates the individual amounts due to each Plaintiff by (i) converting each individual's salary at Kroger to a regular hourly rate, by dividing the salary by ██████ hours; (ii) obtaining the overtime rate of each individual by multiplying that regular hourly rate by ██████; (iii) determining the weeks of employment for each individual discounting any applicable leaves of absence; (iv) multiplying the overtime rate by the estimated amount of overtime hours (generally, ██████ hours per person), and further multiplied by the individual's weeks of employment, and, finally, (vi) multiplying the total amount owed in overtime back wages by ██████ to account for liquidated damages under the FLSA.
20. As part of the settlement, the Plaintiffs will receive the equivalent of ██████ of their back wages (██████ of back wages, plus ██████ of liquidated damages). This substantial amount, which is agreed to by the Representative Plaintiffs, accounts for the inherent risk of trial and ongoing litigation (including appeals). Had this case not settled, there is a substantial risk that Defendants could have succeeded. As such, there was a substantial risk of non-payment both to the Plaintiffs and Plaintiffs' counsel.

21. The attorney's fees were also reduced significantly to account for these same factors. Indeed, while the total in fees is [REDACTED], Plaintiffs have accepted a reduction of approximately [REDACTED] (or [REDACTED]).
22. The amount in expenses ([REDACTED]) accounts for fixed costs throughout the litigation that were necessary and reasonable, including, but not limited to, mailing/postage/copying charges, filing fees, phone line costs, parking/travel, deposition attendance (court reporter) and transcript fees, witness fees, and significant legal research costs. A true and accurate copy of a report detailing these expenses is included on the final page of **Attachment 1**.
23. The Settlement Agreement's Service Award of [REDACTED] to each Representative Plaintiff (totaling [REDACTED]) was also a result of arm's length negotiations and is a modest award which is consistent with the awards typically approved in FLSA collective action settlements.
24. Representative Plaintiffs Joseph Hardesty, Madeline Hickey, and Derek Chipman all participated throughout this Litigation over and above other Plaintiffs, including attending multiple conferences with counsel, submitting to video depositions, attending mediation and pre-trial conferences, and assisting in negotiations which resulted in a settlement prior to trial.

I declare under penalty of perjury that the foregoing is true and correct.



Joshua M. Smith

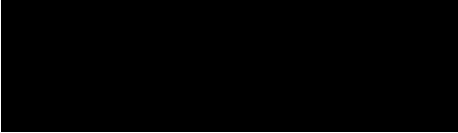
Dated: 7/5/2022

Stagnaro, Saba & Patterson Co., L.P.A.

2623 Erie Avenue
Cincinnati, OH 45208
Billing Inquiries (513) 533-2479

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May 24, 2022

Invoice # 790903

Invoice Summary

Professional services rendered through May 5, 2022:

Client.Matter: 14690.19512

Reference: FLSA

Professional Services

[REDACTED]

Total Expenses

[REDACTED]

Total This Invoice

[REDACTED]

*Stagnaro, Saba & Patterson Co., L.P.A.*Hardesty, Joseph
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Date	Int	Professional Services	Hours	Amount
9/24/15	JMS	Telephone conference with the client regarding questionnaire and follow-up questions		
9/24/15	JMS	Legal research regarding wage and hour issues		
10/28/15	JMS	Draft request for pay records and client authorization form and correspondence to Sharon J. Sobers regarding the same		
10/28/15	JMS	Telephone conference with the client regarding the same and related issues		
10/29/15	EFP	Revise and finalize client authorization and request for pay records		
10/29/15	EFP	Email to Kroger regarding request for pay records		
10/29/15	JMS	Draft and revise correspondence to Kroger regarding request for pay records and client authorization form, correspondence to Emma F. Paxton regarding the same		
10/29/15	JMS	Conference with the client regarding authorization and request for pay records		
11/02/15	EFP	Email to the client regarding request for pay records		
11/02/15	JMS	Legal research regarding wage and hour issues, correspondence to Sharon J. Sobers regarding the same		
11/02/15	JMS	Correspondence to the client regarding wage and hour issues		
11/03/15	JMS	Conference with Emma F. Paxton regarding dates for statute of limitations		
11/03/15	JMS	Legal research regarding wage and hour issues		
11/03/15	JMS	Conference with Sharon J. Sobers regarding wage and hour issues		
11/03/15	JMS	Receipt and review of responses from the client regarding job duties		
11/04/15	JMS	Conference with Sharon J. Sobers regarding collective action issues and procedural strategy moving forward		
11/04/15	SJS	Review legal research		
11/04/15	SJS	Conference with Joshua Smith regarding interaction of ADEA and FLSA claims, legal research regarding FLSA claim, issues with FLSA claim, offer of judgment, and calculation of damages (fluctuating workweek, etc.)		
11/04/15	SJS	Legal research regarding FLSA issue and misclassification of recruiters		

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Date	Int	Professional Services	Hours	Amount
11/05/15	JMS	Legal research regarding wage and hour issues and exemptions for administrative and outside sales employees		
11/11/15	JMS	Conference with Sharon J. Sobers regarding wage and hour issues		
11/11/15	JMS	Legal research regarding collective action procedure and issues regarding offers of judgment		
12/01/15	SJS	Legal research regarding "picking off" class/collective action plaintiffs through Rule 68 offer of judgment, legal research regarding Rule 68 offers of judgment mooted collective actions, Discuss Hardesty conversation regarding settlement demand with Joshua M. Smith		
12/01/15	SJS	Discuss offer of judgment caselaw briefly		
12/03/15	SJS	Legal research regarding picking off plaintiffs, Continue legal research regarding picking off plaintiffs, review cases cited in Charvot decision regarding picking off plaintiffs		
12/08/15	JMS	Conference with the client regarding job duties and other potential FLSA wage and hour issues		
12/08/15	JMS	Conference with Sharon J. Sobers regarding issues with respect to filing complaint and upcoming class/collective action matter		
12/08/15	JMS	Correspondence with potential named plaintiff Madeline Hickey regarding representation		
12/08/15	JMS	Receipt and review of response from named plaintiff Madeline Hickey		
12/08/15	JMS	Telephone conference with potential named plaintiff Ckris Matibiri		
12/08/15	JMS	Conference with Christopher R. Jones regarding potential named plaintiff Michael Kovatch and draft correspondence to Christopher R. Jones regarding the same		
12/08/15	SJS	Emails with Josh M. Smith regarding additional plaintiffs for FLSA action		
12/08/15	SJS	Prepare for meeting with Joshua M. Smith regarding FLSA, conference with Joshua Smith regarding FLSA litigation		
12/09/15	JMS	Telephone conference with opposing counsel regarding settlement; Draft settlement memo; Conference with Sharon J. Sobers regarding offer of settlement; Telephone conference with the client regarding the same		
12/09/15	JMS	Correspondence with potential named plaintiff Madeline Hickey regarding other potential witnesses		

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Date	Int	Professional Services	Hours	Amount
12/09/15	JMS	Legal research regarding administrative exemptions for human resources employees		
12/09/15	SJS	Legal research regarding adequacy of counsel for class action, legal research regarding Ohio wage law issues		
12/09/15	SJS	Research regarding Ohio law on preemption and opt-in/opt-out; Review Monihan pleadings; Conference with Joshua M. Smith regarding responding to Kroger's settlement offer		
12/09/15	SJS	Review Monihan pleadings		
12/09/15	SJS	Conference with Joshua M. Smith regarding responding to Kroger's settlement offer and exhibits to request for unemployment hearing		
12/10/15	JMS	Draft complaint; Conference with Sharon J. Sobers regarding the same		
12/10/15	JMS	Legal research regarding conditional certification standards and decisions in the Sixth Circuit		
12/10/15	JMS	Draft consent forms		
12/10/15	SJS	Review NELA FLSA seminar materials, legal research regarding hybrid class actions in the Sixth Circuit		
12/11/15	JMS	Review decision in Monahan v. Smyth Automotive in preparation for pleading state wage claims in complaint		
12/11/15	JMS	Telephone conference with Peter A. Saba regarding status of named plaintiffs		
12/11/15	JMS	Draft complaint		
12/14/15	JMS	Conference with named plaintiff Madeline Hickey investigation of claims		
12/14/15	JMS	Revise complaint; Conference with Sharon J. Sobers regarding the same		
12/14/15	JMS	Legal research regarding adequacy of representation, commonality, and related state wage claims		
12/14/15	JMS	Conference with Peter A. Saba regarding status of collective action		
12/14/15	JMS	Telephone conference with potential named plaintiff Ckris Matibiri regarding representation		
12/14/15	JMS	Correspondence to named plaintiff Ckris Matibiri regarding fee agreement; Telephone conference with potential named plaintiff Derek Chipman regarding representation		

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Date	Int	Professional Services	Hours	Amount
12/14/15	JMS	Provide status update to Peter A. Saba and Sharon J. Sobers		
12/14/15	SJS	Review Monihan issues prior to conference with Joshua M. Smith regarding complaint, conference with Joshua M. Smith regarding Monihan briefing and required provisions for complaint		
12/15/15	SJS	Review Joshua M. Smith's status email, Email to Joshua M. Smith regarding next steps		
12/16/15	JMS	Revise complaint		
12/17/15	SJS	Review issues regarding motion for certification		
12/21/15	JMS	Legal research regarding Ohio class action and recent decision from First District Court of Appeals, correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
12/22/15	SJS	Conference with Joshua M. Smith regarding status		
12/24/15	JMS	Legal research regarding administrative exemption with respect to call center employees		
12/27/15	JMS	Legal research regarding conditional certification and legal standard		
12/27/15	JMS	Call to Derek Chipman regarding representation		
12/28/15	JMS	Draft motion for conditional class certification		
12/31/15	JMS	Legal research regarding collective action claims in conjunction with Ohio class action claims		
12/31/15	JMS	Telephone conference with the client; Correspondence to Emma F. Paxton regarding the same		
1/04/16	EFP	Review certified mail receipts regarding request for pay records		
1/04/16	JMS	Draft correspondence to Kroger regarding failure to provide pay records and correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
1/04/16	JMS	Legal research regarding conditional certification and related issues		
1/04/16	JMS	Telephone conference with Derek Chipman regarding fee agreement and scheduled conference; Correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
1/04/16	JMS	Telephone conference with Sharon J. Sobers regarding litigation strategy and potential deadlines		

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Date	Int	Professional Services	Hours	Amount
1/04/16	JMS	Telephone conference with the client regarding status of case		
1/04/16	JMS	Revise complaint; Correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
1/04/16	JMS	Draft litigation strategy and calendar of deadlines		
1/04/16	JMS	Correspondence to Sharon J. Sobers regarding letter to Kroger requesting pay records and potential lawsuit		
1/04/16	SJS	Legal research regarding 6th Circuit caselaw on class certification and violation of the requirement to produce wage information under Ohio wage statutes		
1/04/16	SJS	Conference with Joshua M. Smith regarding timeline for case issues		
1/05/16	EFP	Revise and finalize correspondence to Kroger regarding pay records, email to Kroger regarding pay records correspondence and email to the client regarding email to Kroger		
1/05/16	JMS	Legal research regarding equitable tolling with respect to FLSA actions		
1/05/16	JMS	Revise litigation strategy spreadsheet and correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
1/06/16	EFP	Review consents from the client		
1/06/16	JMS	Preparation for and meeting with the client and Derek Chipman regarding typical day to day duties at Kroger		
1/06/16	SJS	Review opt-in consent form, research background for development of form		
1/06/16	SJS	Conference with Joshua M. Smith regarding opt-in forms, contents of folders in Kaiser litigation, and Hardesty's resume		
1/06/16	SJS	Review class complaint		
1/07/16	JMS	Revise complaint		
1/07/16	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding status update on litigation		
1/11/16	JMS	Outline and draft motion for conditional certification		
1/11/16	JMS	Telephone conference with the client regarding status of claims		
1/11/16	JMS	Conference with Sharon J. Sobers regarding motion for class certification		

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Date	Int	Professional Services	Hours	Amount
1/13/16	JMS	Revise motion for conditional certification		
1/13/16	JMS	Conference with Sharon J. Sobers regarding litigation strategy and upcoming deadlines		
1/13/16	JMS	Conference with Sharon J. Sobers regarding revisions to complaint		
1/13/16	JMS	Legal research regarding offers of judgment and mooted class action claims		
1/13/16	SJS	Draft topics for declarations		
1/13/16	SJS	Draft outline of motions for collective action certification		
1/13/16	SJS	Review and revise schedule for class action/age discrimination claim		
1/13/16	SJS	Prepare for meeting with Joshua Smith to discuss schedule for FLSA actions, changes to FLSA complaint, review FLSA Complaint, review schedule for FLSA claims, review FLSA complaint		
1/14/16	JMS	Review complaint with Sharon J. Sobers; Revise the same		
1/14/16	JMS	Legal research regarding offers of judgment mooted class or collective actions; Conference with Sharon J. Sobers regarding the same		
1/14/16	JMS	Review FLSA overview documents provided by Sharon J. Sobers		
1/14/16	SJS	Review class certification cases for supporting materials, legal research regarding motions for certification, review "FLSA Litigation Basics," from NELA Seminar, conference with Joshua M. Smith regarding same, continue review of NELA seminar materials		
1/14/16	SJS	Conference with Joshua M. Smith regarding FLSA payments to undocumented immigrant workers		
1/15/16	JMS	Revise complaint		
1/18/16	JMS	Revise complaint		
1/20/16	SJS	Legal research: Review Campbell-Ewald Gomez decision from US Supreme Court, exchange emails with Joshua M. Smith regarding the same		
1/22/16	JMS	Legal research regarding offers of judgment and recent decision by the United States Supreme Court in Campbell-Ewald v. Gomez		
1/25/16	EFP	Legal research regarding previous Kroger FLSA class actions		

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Date	Int	Professional Services	Hours	Amount
1/25/16	JMS	Legal research regarding offers of judgment in the Sixth Circuit; Legal research regarding use of declaratory judgment in FLSA actions		
1/25/16	SJS	Legal research regarding declaratory judgment in the Sixth Circuit, legal research regarding declaratory judgment		
1/26/16	JMS	Legal research regarding declaratory judgment in FLSA actions; Correspondence to Sharon J. Sobers regarding the same		
1/26/16	JMS	Revise complaint		
1/26/16	JMS	Conference with Sharon J. Sobers regarding plaintiff and witness declarations and further factual investigation		
1/26/16	JMS	Research regarding potential of bringing collective and class actions under Rule 23(b)(2) for injunctive relief; Correspondence with Sharon J. Sobers regarding the same; Conference with Sharon J. Sobers regarding the same		
1/26/16	SJS	Review Joshua M. Smith's declaratory judgment case		
1/26/16	SJS	Legal research regarding class certification in the Sixth Circuit		
1/26/16	SJS	Review complaint		
1/26/16	SJS	Legal research regarding class actions		
1/27/16	JMS	Revise complaint		
1/27/16	JMS	Legal research regarding ORC 4113.15		
1/27/16	JMS	Draft declarations		
1/27/16	JMS	Telephone conference with the client		
1/28/16	JMS	Telephone conference with the client regarding W-2's		
1/29/16	EFP	Make changes to complaint		
1/29/16	JMS	Telephone conference with the client regarding draft complaint		
1/29/16	JMS	Telephone conference with Derek Chipman regarding fact issues		
1/29/16	JMS	Correspondence to Sharon J. Sobers regarding the same		
1/29/16	JMS	Finalize draft of complaint to be sent to clients		
1/30/16	JMS	Receipt and review of correspondence from the clients regarding complaint		

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Date	Int	Professional Services	Hours	Amount
1/30/16	JMS	Revise complaint		
1/30/16	JMS	Legal research regarding Ohio unpaid wage claims		
2/01/16	JMS	Telephone conference with the client regarding W-2's and FLSA complaint		
2/01/16	JMS	Correspondence to counsel for Kroger regarding status of W-2's		
2/01/16	JMS	Correspondence to Christopher R. Jones regarding update on status of witness		
2/01/16	JMS	Correspondence to Kroger regarding W-2's of client; Correspondence to the client regarding the same		
2/01/16	JMS	Revise complaint; Correspondence with Sharon J. Sobers regarding the same		
2/01/16	JMS	Legal research regarding declaratory judgment actions with respect to FLSA collective action claims		
2/01/16	JMS	Receipt and review of correspondence from the client		
2/01/16	JMS	Follow-up telephone conference with Ckris Matibiri regarding job duties, hours worked, and other allegations against Kroger; Draft memo to file regarding the same		
2/01/16	JMS	Review of Dukes v. Wal-Mart decision and correspondence to Sharon J. Sobers regarding the same		
2/01/16	SJS	Prepare chronology for meeting with Peter A. Saba		
2/01/16	SJS	Conference with Joshua Smith regarding bringing Declaratory Judgment as part of Collective Action, legal research during discussion		
2/02/16	EFP	Make changes to litigation memo		
2/02/16	JMS	Review file		
2/02/16	JMS	Draft memo regarding potential declarants and testimony; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
2/02/16	JMS	Correspondence to Madeline Hickey regarding review of complaint		
2/02/16	JMS	Correspondence to Christopher R. Jones regarding Michael Kovatch start date		

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Date	Int	Professional Services	Hours	Amount
2/02/16	JMS	Conference with Peter A. Saba and Sharon J. Sobers regarding complaint, legal research, upcoming deadlines, and other related issues in upcoming litigation		
2/02/16	JMS	Correspondence to Kroger law department regarding W-2 request		
2/02/16	PAS	Conference with Sharon J. Sobers and Josh M. Smith regarding issues with respect to commonality, factual support for overtime, timing of filing, and discovery		
2/02/16	SJS	Review Joshua Smith email regarding list of potential individuals willing to sign declarations		
2/02/16	SJS	Conference with Peter A. Saba and Joshua M. Smith regarding status of collective action		
2/03/16	JMS	Legal research regarding picking off plaintiffs and declaratory judgment		
2/03/16	SJS	Review Dukes		
2/03/16	SJS	Review and revise class action section of complaint		
2/03/16	SJS	Legal research regarding class actions		
2/03/16	SJS	Finish first review of Dukes		
2/04/16	JMS	Conference with the client regarding draft complaint and legal strategy regarding individual claims		
2/04/16	JMS	Draft memo to file regarding Rhonda Furr		
2/04/16	JMS	Conference with Sharon J. Sobers regarding draft complaint		
2/04/16	SJS	Review Mt. Clemens Pottery decision and associated cases regarding continuing validity of Mt. Clemens holding regarding situations where there are no time records, review NELA Seminar Notebook for information regarding calculation of damages, legal research regarding class actions		
2/04/16	SJS	Review and revise FLSA class action complaint		
2/04/16	SJS	Conference with Joshua M. Smith regarding final revisions		
2/05/16	JMS	Revise complaint and correspondence to Peter A. Saba regarding the same		
2/08/16	JMS	Telephone conference with the client regarding potential opt-in Rhonda Furr		

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Date	Int	Professional Services	Hours	Amount
2/08/16	SJS	Review schedule and filing date estimates		
2/09/16	EFP	Review procedures for filing class action complaint		
2/09/16	EFP	Research regarding applicant tracking systems		
2/09/16	EFP	Finalize complaint, exhibit, civil cover sheet, and notices and waivers of summons		
2/09/16	EFP	Telephone conference with the Court x2 regarding complaint issues		
2/09/16	EFP	File complaint, exhibit, and civil cover sheet		
2/09/16	EFP	Correspondence to defendants regarding notices and waivers of service of summons		
2/09/16	JMS	Receipt and review of redlined complaint from Peter A. Saba and correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
2/09/16	JMS	Conference with Peter A. Saba and Sharon J. Sobers regarding changes to complaint		
2/09/16	PAS	Review and revise class action complaint		
2/09/16	PAS	Conference with Josh M. Smith and Sharon J. Sobers regarding issues with changes to complaint and filing		
2/09/16	PAS	Receipt and review of correspondence from the Court		
2/09/16	SJS	Review previous motion for certification regarding class certification		
2/09/16	SJS	Telephone conference with Peter A. Saba regarding changes to complaint		
2/09/16	SJS	Review redline of Peter A. Saba's regarding changes to complaint		
2/09/16	SJS	Conference with Peter A. Saba and Joshua M. Smith regarding complaint		
2/09/16	SJS	Draft model declaration for FLSA action		
2/10/16	EFP	Create file, email to the clients regarding complaint and notices of lawsuit and review news articles regarding lawsuit		
2/10/16	JMS	Telephone conference with the client regarding status of complaint, released news article, and potential opt-ins		

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2/10/16	JMS	Telephone conference with Rhonda Furr and correspondence to the client regarding the same		
2/10/16	JMS	Revise motion for conditional certification		
2/10/16	PAS	Receipt and review of correspondence from Law 360		
2/11/16	EFP	Telephone conference with potential witness/class member x2 regarding additional information		
2/11/16	EFP	Draft and revise notice of appearance of Josh M. Smith		
2/11/16	EFP	File notice of appearance of Josh M. Smith		
2/11/16	EFP	Draft and revise notice of appearance of Sharon J. Sobers		
2/11/16	EFP	Research regarding contact information for Carmen Miller		
2/11/16	EFP	Research regarding filing consents to become plaintiff before filing motion to certify class		
2/11/16	EFP	Draft and revise spreadsheet of plaintiffs and potential opt-ins		
2/11/16	JMS	Telephone conference with potential opt-in Amanda Gayhart; Draft memo to file regarding the same; Correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
2/11/16	JMS	Receipt and review of correspondence from Amanda Gayhart regarding exit interview with Kroger and issues noted		
2/11/16	JMS	Correspondence with Madeline Hickey regarding news article and future potential opt-in witness		
2/11/16	JMS	Telephone conference with Joseph Hardesty regarding potential opt-in and witness Rhonda Furr		
2/11/16	JMS	Telephone conference with potential opt-in witness Christian Bradley; Draft memo to file regarding the same; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
2/11/16	JMS	Follow-up telephone conference to potential opt-in witness Christian Bradley		
2/11/16	JMS	Conference with Sharon J. Sobers regarding necessary documents for motion for conditional certification		
2/11/16	JMS	Draft questionnaire for potential opt-in plaintiffs and witnesses; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		

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Date	Int	Professional Services	Hours	Amount
2/11/16	JMS	Review spreadsheet with information on all potential opt-in plaintiffs; Correspondence with Emma F. Paxton regarding the same		
2/11/16	JMS	Conference with Christopher R. Jones regarding FLSA claims against Kroger and potential opt-in witness Michael Kovatch		
2/11/16	JMS	Receipt and review of voicemail from client regarding Rhonda Furr and changes to Kroger policy on clock-in/clock-out; Correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
2/11/16	PAS	Receipt and review of correspondence from potential plaintiffs		
2/11/16	PAS	Receipt and review of correspondence from the Court		
2/11/16	PAS	Conference with Josh M. Smith regarding issues with charting evidence and questions for witnesses		
2/11/16	SJS	Legal research regarding authority for time for filing opt-in forms and wording for non-plaintiff opt-in forms, review emails from Joshua M. Smith regarding calls from potential opt-ins, draft task list for motion to certify, conference with Joshua M. Smith regarding task list and in particular setting up databases, opt-in lists, review consent forms, legal research regarding time for filing opt-in forms and date of commencement of action, email to Joshua M. Smith regarding the same, review opt-in consent form, email to Joshua M. Smith regarding the same		
2/12/16	EFP	Legal research regarding consent form language, telephone conference with potential class member, review and revise opt-in form		
2/12/16	JMS	Telephone conference with the client regarding status update		
2/12/16	JMS	Draft memo to file regarding general questions for witnesses and proof required for damages in relation to wage and hour claims		
2/12/16	JMS	Telephone conference with potential opt-in Dominic Martin		
2/12/16	PAS	Conference with Josh M. Smith regarding evidence in support of excess hours worked; Conference with Josh M. Smith regarding issues with confidentiality		
2/15/16	EFP	Revise notice of appearance of Sharon J. Sobers; File the same		
2/15/16	JMS	Conference with Sharon J. Sobers regarding reports of Kroger's subsequent remedial measures, and information necessary for witness and opt-in declarations		

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2/15/16	PAS	Receipt and review of correspondence from the Court		
2/15/16	SJS	Legal research regarding damages (Mt. Clemens), i.e. that credible testimony by plaintiff regarding damages can be sufficient		
2/15/16	SJS	Conference with Joshua Smith regarding failure to pay 401K benefits as damage and scheduling issues		
2/15/16	SJS	Research regarding scheduling issues		
2/15/16	SJS	Email to Joshua M. Smith regarding the same		
2/16/16	EFP	Receipt and review of return receipts for service to Kroger		
2/16/16	JMS	Revise motion for conditional certification		
2/17/16	EFP	Review news articles regarding requests for contact information		
2/17/16	JMS	Follow-up correspondence to Christian Bradley regarding opt-in representation form		
2/17/16	JMS	Telephone conference with potential opt-in Sara Elkins		
2/17/16	JMS	Correspondence to potential opt-in Sara Elkins regarding opt-in form and follow-up questions		
2/17/16	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding appointment with Sara Elkins		
2/17/16	JMS	Conference with Christopher R. Jones regarding potential opt-in Michael Kovatch		
2/17/16	JMS	Telephone conference with potential opt-in Kimberly Burchett		
2/17/16	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
2/17/16	PAS	Conference with Josh M. Smith regarding issues with new opt-ins		
2/18/16	EFP	Revise opt-in spreadsheet regarding information from Sara Elkins		
2/18/16	JMS	Telephone conference with the client regarding status update to case		
2/18/16	JMS	Receipt and review of correspondence from Sara Rainey regarding opt-in; Correspondence to Emma F. Paxton regarding the same		
2/18/16	JMS	Receipt and review of correspondence from potential opt-in Sara Rainey; Correspondence to Emma F. Paxton regarding the same		
2/19/16	JMS	Draft motion for conditional certification		

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2/20/16	JMS	Draft motion for conditional certification		
2/22/16	EFP	Review documents from Kim Burchett and Sara Elkins; Correspondence to Kim Burchett regarding original notes		
2/22/16	JMS	Consultation with Sara Elkins and Kim Burchett regarding opt-in and wage and hour issues		
2/22/16	JMS	Telephone conference with the client regarding potential opt-in witness Rhonda Furr and updates regarding issues at Kroger		
2/22/16	JMS	Receipt and review of opt-in form from Rhonda Furr		
2/22/16	JMS	Correspondence with Rhonda Furr regarding opt-in form and issues at Kroger		
2/22/16	JMS	Correspondence with opt-in Kimberly Burchett regarding resignation letter and correspondence with Peter A. Saba regarding the same		
2/22/16	PAS	Conference with Josh M. Smith regarding review of employee resignation letter		
2/23/16	JMS	Review of documentation provided by potential opt-ins regarding resignation, hours worked, and employer policy handbook		
2/23/16	JMS	Correspondence with potential opt-in Rhonda Furr regarding factual issues		
2/23/16	JMS	Correspondence with Madeline Hickey regarding status update and anticipated events prior to trial		
2/24/16	JMS	Telephone conference with potential opt-in Kim Burchett regarding follow-up questions; Draft memo to file regarding the same		
2/24/16	JMS	Conference with Peter A. Saba regarding primary duty issues		
2/26/16	JMS	Correspondence to plaintiff Madeline Hickey regarding Kroger's answer to complaint and anticipated responses		
2/26/16	JMS	Revise motion for conditional certification		
2/29/16	SJS	Review email regarding Burchett interview, finish review of Burchett memo and determine issues to be addressed		
3/01/16	JMS	Legal research regarding class action certification and liability/damage determinations in preparation for drafting motion for class certification		
3/03/16	JMS	Conference with Sharon J. Sobers regarding administrative exemption issues		

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3/05/16	JMS	Revise motion for conditional certification; Legal research regarding administrative exemption		
3/07/16	JMS	Telephone conference with Sharon J. Sobers regarding waiver of service of summons and deadline		
3/07/16	SJS	Legal research regarding administrative exemption		
3/08/16	JMS	Correspondence to opposing counsel regarding waiver of service of summons, receipt and review of correspondence regarding the same and conference with Sharon J. Sobers regarding the same		
3/08/16	SJS	Continued review of recent Sixth Circuit law on administrative exemption		
3/08/16	SJS	Discuss next steps in the preparation of motion to certify with Joshua M. Smith		
3/09/16	EFP	Legal research regarding opposing counsel's federal cases		
3/09/16	JMS	Receipt and review of memo from Sharon J. Sobers regarding opposing counsel; Telephone conference with Sharon J. Sobers regarding the same		
3/09/16	JMS	Revise motion for conditional certification		
3/09/16	JMS	Conference with Sharon J. Sobers regarding declarations		
3/09/16	JMS	Receipt and review of documents from opt-in Michael Kovatch and correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
3/09/16	PAS	Receipt and review of correspondence from opposing counsel; Receipt and review of correspondence from the Court		
3/09/16	SJS	Legal research regarding certification standard in 6th Circuit, review 6th Circuit collective action certification decisions, legal research regarding certification standard in Sixth Circuit, recent case law, misclassification		
3/09/16	SJS	Conference with Joshua M. Smith regarding obtaining declarations from various call center teams		
3/09/16	SJS	Review and revise draft declaration in light of legal research		
3/10/16	EFP	Receipt and review of waivers of service from opposing counsel; File waivers of service of summons; Email to the client regarding waiver of service of summons		

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3/10/16	EFP	Review answer deadline		
3/10/16	EFP	Draft and revise notice of filing consents to become plaintiff		
3/10/16	EFP	File notice of filing and consents		
3/10/16	EFP	Correspondence to opposing counsel regarding notice of filing and consents		
3/10/16	EFP	Email to opposing counsel regarding notice of filing and consents		
3/10/16	EFP	Email to the client regarding notice of filing and consents		
3/10/16	JMS	Correspondence to opposing counsel regarding waiver of service; Telephone conference with Sharon J. Sobers and Emma F. Paxton regarding the same		
3/10/16	JMS	Revise motion for conditional certification		
3/10/16	JMS	Revise notice of filing consents; Correspondence to Sharon J. Sobers regarding the same; Telephone conference with Sharon J. Sobers regarding the same		
3/10/16	PAS	Receipt and review of correspondence from the Court x4; Review email regarding scheduling		
3/10/16	SJS	Legal research regarding recruiters claiming overtime, review research regarding time to file opt-in forms, legal research regarding recruiters/call center employees		
3/11/16	JMS	Revise motion for conditional certification		
3/14/16	JMS	Revise motion for conditional certification		
3/14/16	JMS	Draft and revise declaration of Joseph Hardesty		
3/15/16	EFP	Calculate deadline to exchange attorney fee information		
3/15/16	JMS	Revise motion for conditional certification; conference with Sharon J. Sobers regarding the same		
3/15/16	JMS	Telephone conference with Sharon J. Sobers regarding opposing counsel		
3/15/16	JMS	Review Judge Black's standing orders and other local procedures in the Southern District		
3/15/16	JMS	Receipt and review of notes from Sharon J. Sobers regarding meeting with Peter A. Saba		

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3/15/16	SJS	Review voicemail from opposing counsel, email to Peter A. Saba and Joshua M. Smith regarding voicemail, review procedure, prepare cases for meeting with Peter A. Saba regarding call from opposing counsel, conference with Joshua M. Smith regarding call from opposing counsel, draft chronology for conference with Peter A. Saba		
3/15/16	SJS	Legal research regarding time to file opt-in forms		
3/16/16	JMS	Conference with Sharon J. Sobers and Peter A. Saba regarding motion for conditional certification and potential discovery issues		
3/16/16	JMS	Telephone conference with opposing counsel, Peter A. Saba and Sharon J. Sobers regarding discovery and procedural issues		
3/16/16	JMS	Legal research regarding preliminary discovery prior to motion for conditional certification; Correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
3/16/16	JMS	Conference with Sharon J. Sobers regarding draft of motion for conditional certification		
3/16/16	JMS	Draft memo to file regarding offers of judgment, conditional certification standard, and legal strategy with respect to FLSA claims		
3/16/16	JMS	Telephone conference with Joseph Hardesty regarding interchangeability of recruiters on teams		
3/16/16	JMS	Multiple correspondence to opt-in plaintiffs and named plaintiffs regarding assisting other teams at CoRE		
3/16/16	PAS	Review evidence supporting commonality of issues, overriding policy, and facts supporting employees' similar situations		
3/16/16	PAS	Conference with Josh M. Smith regarding issues with discovery; evidence supporting conditional certification and timing of filings		
3/16/16	PAS	Telephone conference with opposing counsel regarding issues with tolling and calculation of overtime		
3/16/16	SJS	Review certification standard in Monroe		
3/16/16	SJS	Review Derek Chipman email forwarded from Joshua M. Smith		
3/16/16	SJS	Review draft of facts and legal analysis for certification of collective action in draft motion to certify		
3/16/16	SJS	Review Smith v. Lowes decision		

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3/16/16	SJS	Review emails from Joshua M. Smith to Peter A. Saba prior to meeting regarding call to opposing counsel		
3/16/16	SJS	Legal research regarding class action certification		
3/16/16	SJS	Conference with Peter A. Saba and Joshua M. Smith prior to initial phone call to opposing counsel		
3/16/16	SJS	Conference with Joshua M. Smith regarding fact section and collective action section of draft motion for class certification		
3/17/16	JMS	Telephone conference with Joseph Hardesty regarding job classification and hours worked		
3/18/16	JMS	Receipt and review of correspondence from Sara Rainey		
3/18/16	JMS	Telephone conference with the client regarding status update		
3/22/16	JMS	Revise motion for conditional certification; Correspondence to Sharon J. Sobers regarding the same		
3/22/16	JMS	Receipt and review of Tyson Foods decision; Correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
3/22/16	JMS	Telephone conference with Peter A. Saba regarding damages calculations and drafting memo to file regarding the same		
3/22/16	SJS	Review US Supreme Court decision in Tyson Foods/Bouaphakeo		
3/23/16	JMS	Telephone conference with the client regarding status update		
3/23/16	JMS	Receipt and review of legal research memo from Sharon J. Sobers regarding Tyson Foods decision		
3/23/16	SJS	Review Tyson v. Bouaphakeo decision by US Supreme Court		
3/23/16	SJS	Draft memo to Peter A. Saba and Joshua M. Smith regarding calculation of damages in FLSA litigation		
3/23/16	SJS	Review administrative exemption cases to discuss with Joshua M. Smith		
3/24/16	JMS	Conference with Sharon J. Sobers regarding motion for conditional certification draft and declaration of Joseph Hardesty		
3/24/16	JMS	Telephone conference with the client regarding status update		
3/24/16	JMS	Correspondence with opposing counsel x2 regarding meeting		
3/24/16	JMS	Revise motion for conditional certification		

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3/24/16	JMS	Revise declaration of Joseph Hardesty in support of motion for conditional certification		
3/24/16	JMS	Review of Sharon J. Sobers's redline to Hardesty declaration; Revise the same; Correspondence to Sharon J. Sobers regarding the same		
3/24/16	SJS	Review drafts of declaration and motion to certify collective action section		
3/24/16	SJS	Conference with Joshua M. Smith regarding motion to certify, declaration, and information needed for meeting with opposing counsel		
3/24/16	SJS	Prepare redline of declaration		
3/25/16	JMS	Review correspondence from Sharon J. Sobers regarding Hardesty affidavit		
3/28/16	JMS	Revise motion for conditional certification		
3/28/16	JMS	Draft and revise potential notices to class and collective action members		
3/28/16	JMS	Draft letter to class members regarding notices		
3/28/16	JMS	Draft exclusion form		
3/28/16	JMS	Draft declaration of Kim Burchett		
3/28/16	JMS	Draft declaration of Derek Chipman		
3/28/16	JMS	Draft memo to file regarding damages estimate; Correspondence to Peter A. Saba and Emma F. Paxton regarding the same		
3/28/16	JMS	Conference with Sharon J. Sobers regarding damages estimate		
3/28/16	SJS	Review and revise affidavit of counsel for Peter A. Saba		
3/28/16	SJS	Conference with Joshua M. Smith regarding damage calculation and declarations		
3/29/16	EFP	Make changes to class action notice; Make changes to declaration of Joseph Hardesty		
3/29/16	JMS	Draft and revise declaration of Derek Chipman and Madeline Hickey		
3/29/16	JMS	Draft and revise declaration of Amanda Gayhart		
3/29/16	JMS	Draft and revise declaration of Michael Kovatch		
3/29/16	JMS	Telephone conference with potential opt-in Ckris Matibiri		

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3/29/16	JMS	Revise Joseph Hardesty declaration		
3/29/16	JMS	Revise declarations of potential opt-in plaintiffs Gayhart, Chipman, and Burchett; Conference with Sharon J. Sobers regarding the same		
3/29/16	JMS	Revise declaration of Madeline Hickey		
3/29/16	JMS	Correspondence with Joe Hardesty regarding declaration		
3/29/16	SJS	Review and revise class action notice		
3/29/16	SJS	Email to Joshua M. Smith regarding changes to declaration		
3/30/16	JMS	Correspondence to multiple declarants (Derek Chipman, Madeline Hickey, Joseph Hardesty, Amanda Gayhart, Michael Kovatch) regarding draft declarations and follow-up questions		
3/30/16	JMS	Multiple correspondence with potential opt-in Amanda Gayhart regarding changes to declaration		
3/30/16	JMS	Telephone conference with Joe Hardesty regarding draft declaration		
3/30/16	JMS	Telephone conference with Derek Chipman regarding declaration and related issues; Correspondence with Derek Chipman regarding the same		
3/30/16	JMS	Draft memo to file regarding telephone conference with Derek Chipman and issues regarding criminal background checks; Correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
3/30/16	JMS	Revise affidavit of Amanda Gayhart		
3/30/16	JMS	Telephone conference with Amanda Gayhart; Draft memo to file and correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
3/30/16	JMS	Conference with Sharon J. Sobers regarding declarations		
3/30/16	JMS	Legal research regarding Ohio class action and conditional certification of class action		
3/30/16	SJS	Review motion to certify		
3/30/16	SJS	Review orders in New Jersey case regarding handling of class action issue		
3/30/16	SJS	Conference with Joshua M. Smith regarding Derek Chipman's discussion of recruiters responsibilities regarding criminal questions, issue of whether discovery is needed for class action certification, and potential solutions to discovery issue		

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3/30/16	SJS	Draft list of items for Peter A. Saba for meeting with opposing counsel		
3/31/16	JMS	Telephone conference with Amanda Gayhart regarding declaration and opt-in participation		
3/31/16	JMS	Telephone conference with Joe Hardesty		
3/31/16	JMS	Legal research regarding class action certification; Correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
3/31/16	JMS	Revise affidavit of Sara Elkins-Shumann		
3/31/16	JMS	Receipt and review of opt-in form from Ckris Matibiri		
3/31/16	JMS	Draft memo to file regarding factual investigation and CoRE Recruiter screening process		
4/01/16	JMS	Telephone conference with the client regarding meeting with opposing counsel, settlement, and discussion of recent CoRE Job Posting		
4/01/16	JMS	Correspondence with potential opt-in Ckris Matibiri regarding lawsuit		
4/01/16	JMS	Correspondence with Derek Chipman regarding declaration		
4/01/16	JMS	Revise declaration; Further correspondence with Derek Chipman regarding the same		
4/01/16	JMS	Legal research regarding class actions and pre-discovery certification; Draft memo to file regarding the same		
4/01/16	JMS	Correspondence with Rhonda Furr regarding witness interview		
4/01/16	PAS	Review job posting on Kroger website		
4/04/16	EFP	Prepare Sharon J. Sobers binder for meeting with opposing counsel		
4/04/16	JMS	Revise damages calculation; Correspondence to Sharon J. Sobers regarding the same		
4/04/16	JMS	Legal research regarding damages with respect to Ohio state claims		
4/04/16	JMS	Correspondence with Madeline Hickey regarding tax documentation; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
4/04/16	JMS	Research class certification issues with respect to statute of limitation and tolling		

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4/04/16	PAS	Conference with Josh M. Smith regarding issues for meeting with opposing counsel; Review damages calculations for meeting with opposing counsel		
4/04/16	SJS	Finish updates to motion to certify for Peter A. Saba's notebook for meeting with opposing counsel		
4/04/16	SJS	Conference with Joshua Smith regarding statute of limitations and liquidated damages for overtime under Ohio statutes, review Joshua M. Smith's argument that overtime liquidated damages are double under Ohio law		
4/04/16	SJS	Review and revise motion for conditional certification		
4/04/16	SJS	Conference with Joshua M. Smith regarding notebook for Peter A. Saba, continued work on notebook for Peter A. Saba for meeting with opposing counsel		
4/05/16	EFP	Prepare documents for meeting with opposing counsel, review documents from opposing counsel		
4/05/16	JMS	Conference with Sharon J. Sobers and Peter A. Saba regarding preparation for meeting with opposing counsel		
4/05/16	JMS	Meeting with opposing counsel		
4/05/16	JMS	Conference with Sharon J. Sobers regarding review of documents from opposing counsel with respect to potential damages and calculation of overtime		
4/05/16	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding W-2 from Madeline Hickey		
4/05/16	JMS	Telephone conference with Joseph Hardesty regarding meeting with opposing counsel and documents produced		
4/05/16	PAS	Review prior conditional certification issues		
4/05/16	PAS	Conference with Josh M. Smith and Sharon J. Sobers regarding issues with conditional certification		
4/05/16	PAS	Prepare for and attend meeting with opposing counsel regarding position regarding litigation		
4/05/16	SJS	Legal research regarding liquidated damages under the Ohio statute		

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4/05/16	SJS	Prepare with Peter A. Saba and Joshua M. Smith regarding meeting with opposing counsel, conference with opposing counsel, Peter A. Saba, and Joshua M. Smith, conference with Joshua M. Smith following meeting with opposing counsel		
4/06/16	EFP	Review documents from opposing counsel and draft spreadsheet of hours worked per week by Hardesty and Chipman		
4/06/16	JMS	Review documentation provided by opposing counsel; Draft memo to file regarding the same		
4/06/16	SJS	Conference with Joshua M. Smith regarding preparation for 26(f) conference and requests for additional information from defendant		
4/07/16	JMS	Conference with the client regarding documentation provided by opposing counsel and related matters		
4/07/16	JMS	Conference with Sharon J. Sobers regarding legal research of call center employees and preparation time		
4/07/16	SJS	Review and revise motion for certify class; Revise and revise collective action section of motion to certify class		
4/08/16	JMS	Telephone conference with the client regarding draft declaration		
4/08/16	JMS	Revise declaration of Kim Burchett		
4/08/16	JMS	Receipt and review of correspondence from Kim Burchett regarding W-2		
4/11/16	EFP	Review filings by Kroger, email to the client regarding filings by Kroger		
4/11/16	JMS	Revise motion for certification of class action; Correspondence and conference with Sharon J. Sobers regarding the same		
4/11/16	JMS	Receipt and review of defendant's answer; Telephone conference with the client regarding the same; Conference with Sharon J. Sobers regarding the same		
4/11/16	JMS	Legal research regarding motion to strike FLSA affirmative defenses as insufficiently pled		
4/11/16	PAS	Receipt and review of correspondence from the Court x4		
4/11/16	SJS	Review answer; Email from Josh M. Smith regarding the same		
4/12/16	JMS	Revise motion for conditional certification		
4/12/16	JMS	Revise declaration of Joe Hardesty		

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4/12/16	JMS	Revise declaration of Derek Chipman; Correspondence to Sharon J. Sobers regarding the same		
4/12/16	JMS	Follow-up research regarding motion to strike and insufficient affirmative defenses		
4/12/16	JMS	Correspondence with opposing counsel regarding 26(f) conference		
4/13/16	JMS	Telephone conference with Sharon J. Sobers regarding litigation status		
4/14/16	EFP	Conference with Sharon J. Sobers regarding class action and collective action notices		
4/14/16	EFP	Revise collective action notice		
4/14/16	EFP	Calculate overall average of hours worked per day for Hardesty and Chipman		
4/14/16	JMS	Conference with Sharon J. Sobers regarding discovery plan and motion for conditional certification		
4/14/16	JMS	Receipt and review of correspondence from opposing counsel; Correspondence with Sharon J. Sobers and Peter A. Saba regarding the same		
4/14/16	JMS	Revise class action portion of motion for conditional certification		
4/14/16	PAS	Receipt and review of correspondence from opposing counsel		
4/14/16	SJS	Review email from Joshua M. Smith regarding topics to discuss; Review notes for 26(f) form; Conference with Joshua Smith regarding 26(f) conference, 26(f) form, and related issues		
4/18/16	JMS	Revise declarations of Amanda Gayhart, Joseph Hardesty, Madeline Hickey, and Derek Chipman		
4/18/16	JMS	Draft declaration of Christian Bradley		
4/18/16	JMS	Revise declaration of Kim Burchett		
4/18/16	JMS	Revise declaration of Sara Elkins-Schumann		
4/18/16	JMS	Correspondence with Peter A. Saba and Sharon J. Sobers regarding discovery and motion for conditional certification		
4/18/16	SJS	Prepare draft of 26(f) form, forward to Joshua M. Smith		
4/18/16	SJS	Review Amanda Gayhart's declaration, forward comments to Joshua M. Smith		

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4/19/16	EFP	Emails to Madeline Hickey and Derek Chipman regarding answer		
4/19/16	JMS	Correspondence with Madeline Hickey regarding Defendant's answer		
4/19/16	JMS	Revise declaration of Ckris Matibiri, Sara Elkins-Schuman, Michael Kovatch, and Kim Burchett; Correspondence to Emma F. Paxton and Sharon J. Sobers regarding the same		
4/19/16	JMS	Telephone conference with Sharon J. Sobers regarding draft declaration of Ckris Matibiri		
4/19/16	JMS	Correspondence with Madeline Hickey regarding Kroger Answer		
4/19/16	JMS	Correspondence to multiple opt-ins regarding draft declarations		
4/19/16	SJS	Review Joshua M. Smith's changes to 26(f) form		
4/20/16	EFP	Make changes to collective action notice		
4/20/16	JMS	Correspondence with Ckris Matibiri regarding declaration		
4/20/16	JMS	Conference with Peter A. Saba and Sharon J. Sobers regarding 26(f) conference		
4/20/16	JMS	Draft informal discovery requests to opposing counsel regarding documentation of hours worked from Kroger; Conference with Sharon J. Sobers regarding the same		
4/20/16	JMS	Review of 26(f) draft report		
4/20/16	JMS	Legal research regarding 26(f) and discovery procedures with respect to collective actions		
4/20/16	PAS	Conference with Sharon J. Sobers and Josh M. Smith regarding issues with 26(f) conference		
4/20/16	SJS	Prepare for meeting with Peter A. Saba regarding 26(f) conference with opposing counsel; Review collective action and class action notices; Conference with Peter A. Saba and Joshua M. Smith in preparation for 26(f) meeting with opposing counsel; Review collective and class action notices, and letter to potential plaintiffs; Email Swigert decisions to Peter A. Saba; Assemble materials for Peter A. Saba for 26(f) conference; Conference with Joshua M. Smith regarding obtaining information regarding Swigert decision from PACER; Review list of potential documents to request from defendant informally; Conference with Josh M. Smith regarding the same		

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4/21/16	EFP	Prepare documents for rule 26(f) conference, revise correspondence to potential plaintiffs		
4/21/16	JMS	Correspondence with opposing counsel regarding 26(f) conference and rescheduling; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
4/22/16	JMS	Revise motion for conditional certification; Correspondence to the clients regarding status update		
4/25/16	JMS	Revise motion for conditional certification; Correspondence to Sharon J. Sobers regarding the same		
4/26/16	JMS	Draft and revise motion to strike		
4/26/16	JMS	Telephone conference with the client regarding status update		
4/26/16	JMS	Revise motion for conditional certification; Telephone conference with Sharon J. Sobers regarding the same		
4/26/16	JMS	Receipt and review of correspondence from potential opt-in Michael Kovatch regarding declaration; Correspondence to Emma F. Paxton regarding the same		
4/26/16	JMS	Legal research regarding Class Action Fairness Act		
4/26/16	SJS	Review and revise class action and collective action notices		
4/26/16	SJS	Legal research regarding the standard for similarly situated in Class Action vs collective action		
4/27/16	JMS	Revise motion to strike; Correspondence to Sharon J. Sobers regarding the same		
4/27/16	JMS	Receipt and review of correspondence from Sharon J. Sobers regarding collective action and research of differing standards between class and collective action		
4/27/16	JMS	Conference with Sharon J. Sobers regarding meeting with Peter A. Saba and 26(f) conference		
4/27/16	JMS	Revise declarations; Correspondence to Sharon J. Sobers regarding the same		
4/27/16	SJS	Review facts in motion for collective action certification and class action		

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4/27/16	SJS	Conference with Joshua M. Smith regarding citing to declarations and issues with declarations related to description of facts in light of conference with opposing counsel		
4/27/16	SJS	Draft footnote regarding difference in similarly situated standard (collective action) and predominance standard (class action) to motion		
4/28/16	EFP	Research regarding filings in other class actions		
4/28/16	JMS	Conference with opposing counsel regarding 26(f) report; Follow-up conference with Peter A. Saba and Sharon J. Sobers regarding the same; Revise 26(f) report; Correspondence with Sharon J. Sobers and Peter A. Saba regarding the same; Conference with Sharon J. Sobers and Peter A. Saba regarding the same		
4/28/16	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding statute of limitations with respect to class actions		
4/28/16	PAS	Attend 26(f) conference with opposing counsel; Conference with Sharon J. Sobers and Josh M. Smith regarding changes to 26(f) report; Review and revise 26(f) report		
4/28/16	SJS	Review and revise motion to strike affirmative defenses		
4/28/16	SJS	Prepare for meeting with opposing counsel regarding 26(f), research regarding initial disclosures in collective action context, review prior litigation, conference with Joshua Smith, Peter A. Saba regarding 26(f) meeting with opposing counsel, 26(f) meeting with Opposing Counsel, review procedures in other Southern District of Ohio collective and class action certifications, review and revise 26(f) motion including Joshua M. Smith's version and Peter A. Saba's version, conference with Joshua M. Smith and Peter A. Saba regarding 26(f) changes prior to sending to opposing counsel		
4/29/16	JMS	Correspondence with Peter A. Saba regarding 26(f) report; Telephone conference with Peter A. Saba regarding the same; Receipt and review of correspondence from opposing counsel regarding 26(f) report; Review opposing counsel changes to 26(f) report		
4/29/16	PAS	Receipt and review of correspondence from opposing counsel; Conference with Josh M. Smith		
4/30/16	JMS	Revise 26(f) report; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		

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5/02/16	EFP	Finalize 26(f) report; Finalize correspondence; Email from opposing counsel regarding 26(f) report; File 26(f) report; Receipt and review of correspondence from the Court; Email to the client regarding 26(f) report		
5/02/16	EFP	Finalize correspondence		
5/02/16	EFP	Email from opposing counsel regarding 26(f) report		
5/02/16	EFP	File 26(f) report		
5/02/16	EFP	Receipt and review of correspondence from the Court		
5/02/16	EFP	Email to the client regarding 26(f) report		
5/02/16	JMS	Conference with Sharon J. Sobers regarding 26(f) report		
5/02/16	JMS	Revise motion to strike		
5/02/16	JMS	Conference with opposing counsel regarding 26(f) report; Correspondence to opposing counsel regarding the same; Receipt and review of revisions regarding the same		
5/02/16	JMS	Review of 26(f) revised report from Sharon J. Sobers; Conference with Emma F. Paxton and Sharon J. Sobers regarding the same		
5/02/16	JMS	Revise letter to opposing counsel regarding 26(f) report		
5/02/16	JMS	Correspondence with Sharon J. Sobers regarding research of statute of limitations and amending/altering order on class action		
5/02/16	JMS	Legal research regarding motion for 23(b) decertification; Correspondence to Sharon J. Sobers regarding the same		
5/02/16	PAS	Conference with Sharon J. Sobers regarding issues with 26(f) report		
5/02/16	SJS	Conference with Peter A. Saba regarding 26(f) conference with opposing counsel; Review previous drafts of Plaintiffs' and Defendants' 26(f) reports; Conference with Joshua M. Smith regarding implications of defendant's proposal and changes; Conference with Peter A. Saba regarding ongoing 26(f) discussions with opposing counsel; Conference with Joshua M. Smith and opposing counsel regarding 26(f) report; Revise 26(f) report; Draft cover letter to opposing counsel regarding 26(f) report; Conference with Joshua M. Smith and Emma F. Paxton regarding correcting Rule 26(f) redline and clean version to forward to opposing counsel		

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5/03/16	JMS	Conference with Sharon J. Sobers regarding motion for conditional certification and declarations		
5/03/16	SJS	Review and revise collective action complaint eliminating references to class action, review declaration of Amanda Gayhart		
5/03/16	SJS	Legal research regarding tolling S/L for class actions		
5/03/16	SJS	Conference with Joshua M. Smith regarding revision of facts section of motion for collective action certification and division of labor going forward to complete motion for collective action certification		
5/04/16	JMS	Correspondence with Amanda Gayhart regarding declaration		
5/04/16	JMS	Conference with Sharon J. Sobers regarding motion for conditional certification		
5/04/16	PAS	Review and revise declaration of Burchett		
5/04/16	SJS	Review recent 6th Circuit FLSA decisions, review decisions regarding forfeiting affirmative defenses, add forfeiting affirmative defense information to motion to certify, review FLSA cases with topics for issues arriving later in litigation		
5/04/16	SJS	Review declarations of Bradley, Chipman, Matibiri, and Hardesty, telephone conference with Joshua M. Smith regarding declarations, email declarations to Peter A. Saba		
5/05/16	JMS	Conference with Sharon J. Sobers regarding declarations; Conference with Peter A. Saba and Sharon J. Sobers regarding declarations; Revise declarations		
5/05/16	PAS	Review and revise declarations		
5/05/16	SJS	Conference with Peter A. Saba and Joshua M. Smith regarding declarations; Review language of each declaration; Compare declaration language against factual allegations in motion to certify in preparation for conference with Joshua M. Smith regarding declarations; Conference with Joshua M. Smith regarding Peter A. Saba's changes to declarations; Review each paragraph of declaration; Revise declarations to cover factual allegations in motion to certify; Review language specific to particular declarations; Create redline of generic changes to be made to all declarations		
5/06/16	EFP	Make changes to declarations		

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5/06/16	JMS	Multiple telephone conferences with Sharon J. Sobers regarding declarations; Telephone conference with Derek Chipman regarding declaration; Revise declarations; Conference with Emma F. Paxton regarding the same; Correspondence with multiple opt-ins regarding declarations		
5/06/16	SJS	Review and revise final draft of declarations prior to sending to declarants, draft cover letter language to send to opt-ins with declaration, conference with Joshua M. Smith regarding status of declarations		
5/06/16	SJS	Review and revise bullet point list in motion to certify regarding ways in which recruiters are similarly situated, email draft of motion for collective action certification to Peter A. Saba		
5/07/16	JMS	Revise declarations; Correspondence to multiple opt-in declarants regarding the same		
5/09/16	EFP	Telephone conference with Amanda Gayhart regarding declaration issues		
5/09/16	EFP	Revise Matibiri declaration		
5/09/16	EFP	Review order setting preliminary pretrial conference		
5/09/16	EFP	Conference with Peter A. Saba regarding telephone conference with the Court		
5/09/16	EFP	Receipt and review of calendar order from the Court		
5/09/16	EFP	Email to the clients regarding calendar order		
5/09/16	JMS	Conference with Sharon J. Sobers regarding declarations; Revise declarations; Conference with the client regarding declaration; Conference with opt-in Amanda Gayhart regarding declaration; Attend pretrial conference; Follow-up conference with Peter A. Saba and Sharon J. Sobers regarding the same		
5/09/16	JMS	Attend Rule 26(f) conference; Follow-up conference with Peter A. Saba and Sharon J. Sobers regarding the same		
5/09/16	PAS	Prepare for and attend pretrial conference; Receipt and review of correspondence from the Court x2		

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5/09/16	SJS	Meeting with Joe Hardesty, prepare for preliminary pretrial conference, email information for preliminary pretrial conference to Peter A. Saba, attend preliminary pretrial conference with Judge Black via telephone, conference with Peter A. Saba and Joshua M. Smith following conference with Judge Black, memo to file regarding the same		
5/09/16	SJS	Draft list of follow-up supplemental questions for opt-ins, i.e. questions to explore more deeply what was said in declarations, email to Joshua M. Smith, review motion to certify identifying changes to be made regarding comparing overtime allegedly worked by each declarant with information in their declaration		
5/09/16	SJS	Prepare changes for Emma F. Paxton to make in declarations		
5/10/16	EFP	Conference with Sharon J. Sobers regarding changes to declarations, revise declarations		
5/10/16	JMS	Revise declaration of Derek Chipman; Correspondence to Chipman regarding the same		
5/10/16	SJS	Draft correspondence regarding declarations, conference with EFP regarding same		
5/10/16	SJS	Review notes on case law regarding cases to add to motion to certify collective action, add cases to motion to certify regarding production of information to facilitate sending notice		
5/11/16	EFP	Emails to plaintiffs regarding revised declarations; Emails with Kimberly Burchett regarding signed declaration		
5/11/16	JMS	Conference with Emma F. Paxton regarding revised declarations; Correspondence with Sharon J. Sobers regarding declarations; Correspondence with Sara Elkins regarding the same; Correspondence with Sharon J. Sobers regarding declarations; Correspondence with Sara Elkins-Schuman regarding declaration		
5/11/16	SJS	Review and revise motion to certify collective action		
5/12/16	EFP	Receipt and review of signed declaration from Ckris Matibiri, email to Ckris Matibiri regarding signed declaration		
5/12/16	JMS	Receipt and review of discovery requests from defendant; Correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
5/12/16	JMS	Correspondence with Madeline Hickey regarding declaration		

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5/12/16	JMS	Conference with Sharon J. Sobers regarding motion for conditional certification		
5/12/16	JMS	Revise declarations		
5/12/16	JMS	Receipt and review of declaration from Madeline Hickey		
5/12/16	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding status of declarations		
5/12/16	PAS	Receipt and review of correspondence from opposing counsel		
5/12/16	SJS	Review and revise motion to certify collective action; Cite check motion; Review and revise letter to potential opt-ins; Prepare exhibit list; Conference with Joshua M. Smith regarding motion to certify		
5/13/16	EFP	Finalize declaration of Joseph Hardesty		
5/13/16	EFP	Finalize declaration of Madeline Hickey		
5/13/16	JMS	Revise motion for conditional certification		
5/14/16	JMS	Revise motion for conditional certification; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
5/14/16	JMS	Telephone conference with Christian Bradley regarding declaration; Revise declaration; Correspondence to Christian Bradley regarding the same		
5/16/16	EFP	Finalize declarations		
5/16/16	EFP	Revise and finalize motion for conditional certification and exhibits		
5/16/16	EFP	File motion for conditional certification		
5/16/16	EFP	Review response deadline		
5/16/16	EFP	Email to the client regarding motion for conditional certification		
5/16/16	JMS	Revise motion for conditional certification; Telephone conference with Peter A. Saba and Emma F. Paxton regarding the same; Conference with Peter A. Saba regarding the same		
5/16/16	JMS	Finalize exhibit list		
5/16/16	JMS	Revise declarations		
5/16/16	JMS	Conference with Emma F. Paxton regarding exhibits to motion for conditional certification		

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5/16/16	PAS	Revise and finalize motion for conditional certification		
5/16/16	PAS	Review and revise employee notice		
5/16/16	SJS	Review Peter A. Saba redline's of motion to certify FLSA class action; Conference with Peter A. Saba and Joshua Smith regarding Peter A. Saba's changes to motion to certify the class; Telephone conference with Christian Bradley regarding declaration; Review motion to certify class; Review decision in Kaiser regarding information requested with respect to sending notices; Forward Kaiser decision to Peter A. Saba and Joshua M. Smith		
5/17/16	PAS	Receipt and review of correspondence from the Court		
5/18/16	JMS	Correspondence to Sharon J. Sobers and Peter A. Saba regarding class certification and changes to department of labor regulations		
5/19/16	SJS	Review 26(f) report and initial disclosures		
5/19/16	SJS	Review 6th Circuit Craig decision		
5/23/16	JMS	Telephone conference with Sharon J. Sobers regarding security cards at Kroger GO; Telephone conference with the client regarding the same		
5/23/16	JMS	Review of employee handbook		
5/23/16	SJS	Review Kroger handbook and notice access cards; Conference with Joshua M. Smith regarding access cards		
5/24/16	JMS	Conference with Sharon J. Sobers regarding discovery requests from Defendant and correspondence to named plaintiffs		
5/24/16	SJS	Review Kroger's discovery requests to named plaintiffs; Conference with Joshua M. Smith regarding letter to named plaintiff's regarding discovery requests		
5/25/16	EFP	Draft and revise spreadsheets for the clients regarding overtime worked per week of employment		
5/25/16	EFP	Convert recruiter job posting to word document		
5/25/16	EFP	Revise and finalize correspondence to plaintiffs regarding discovery requests and spreadsheet		
5/25/16	EFP	Email to plaintiffs regarding discovery requests and spreadsheet		

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5/25/16	JMS	Draft and revise correspondence to clients regarding discovery requests; Correspondence with Sharon J. Sobers and Peter A. Saba regarding the same		
5/25/16	JMS	Review of hours spreadsheets		
5/25/16	JMS	Telephone conference with the client regarding job description inaccuracies		
5/25/16	JMS	Conference with Emma F. Paxton regarding discovery requests and letter to clients		
5/25/16	SJS	Draft discovery requests; Review and revise letter to named plaintiffs regarding discovery responses; Draft discovery requests; Draft discovery requests to defendants; Review documents in file; Review Kroger handbook; Review Madeline Hickey's twitter postings; Conference with Joshua M. Smith regarding issues including the above		
5/26/16	JMS	Receipt and review of discovery responses from Derek Chipman; Correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
5/26/16	SJS	Review Phipps v. Wal-Mart 6th Circuit decision		
6/01/16	JMS	Correspondence with opposing counsel regarding telephone conference		
6/01/16	SJS	Emails with Joshua M. Smith regarding opposing counsel's request for conference call on motion to certify collective action		
6/02/16	JMS	Legal research regarding social media discovery requests; Correspondence with Peter A. Saba and Sharon J. Sobers regarding the same		
6/02/16	JMS	Correspondence with opposing counsel regarding telephone conference (requested by Defense counsel)		
6/06/16	EFP	Review motion to certify regarding versions of notice and correspondence to send to opposing counsel, email to opposing counsel regarding notice and correspondence		
6/06/16	JMS	Telephone conference with opposing counsel regarding motion for conditional certification and notice; Follow-up discussions with Sharon J. Sobers and Peter A. Saba regarding the same		
6/06/16	JMS	Draft response to opposing counsel regarding agreed notice terms		

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6/06/16	JMS	Telephone conference with Sharon J. Sobers regarding notice and bulk mailing service		
6/06/16	JMS	Telephone conference with Class Action Administrators regarding third party service; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
6/06/16	JMS	Receipt and review of Defendant's proposed changes to collective action notice		
6/06/16	PAS	Conference call with opposing counsel		
6/06/16	PAS	Conference with Sharon J. Sobers and Josh M. Smith regarding response to acquiescence to conditional certification		
6/06/16	PAS	Conference with Emma F. Paxton regarding legal bill disclosure		
6/06/16	SJS	Conference with Joshua M. Smith regarding conference call with opposing counsel regarding certification of class, conference call with opposing counsel regarding possibility of consenting to certify class		
6/06/16	SJS	Conference with Joshua M. Smith regarding class administrator for class, conference with Ed Forman and Joshua M. Smith regarding class administrators, telephone conference with Deborah Grayson regarding class action administrators, forward email from Deborah Grayson to Joshua M. Smith with information obtained from Deborah Grayson during telephone call		
6/07/16	JMS	Receipt and review of quote from Class Action Administrators; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
6/07/16	JMS	Conference with Sharon J. Sobers regarding response to opposing counsel's proposed terms of notice; Draft memo to Peter A. Saba regarding the same		
6/07/16	JMS	Conference with Peter A. Saba and Sharon J. Sobers regarding response to opposing counsel terms; Conference with Sharon J. Sobers regarding the same		
6/07/16	JMS	Legal research regarding terms of collective action notice and communications with potential opt-in plaintiffs		
6/07/16	JMS	Draft and revise proposed notice to opposing counsel; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		

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6/07/16	SJS	Review opposing counsel's redline of proposed notice, Conference with Joshua M. Smith regarding issues related to consent certification; Review memo from Joshua M. Smith regarding response to defendant's proposal regarding mutual consent to collective action certification; Review order and briefing in Kaiser regarding notice; Legal research regarding FLSA websites; Review TQL website		
6/08/16	EFP	Draft and revise attorneys fees summary for the Court, draft and revise correspondence to opposing counsel regarding attorneys fees summary		
6/08/16	JMS	Revise response to opposing counsel regarding agreed notice terms; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same; Correspondence to opposing counsel regarding agreed notice terms		
6/08/16	JMS	Revise discovery requests to Kroger; Correspondence to Sharon J. Sobers regarding the same		
6/08/16	PAS	Review and revise correspondence to opposing counsel regarding terms for concession to motion for conditional certification		
6/08/16	PAS	Conference with Josh M. Smith regarding changes to terms		
6/08/16	PAS	Review and revise summary of legal fees		
6/08/16	PAS	Correspondence to opposing counsel		
6/08/16	SJS	Review proposed response to opposing counsel's proposal for a stipulated class certification		
6/09/16	EFP	Review Fledderman fees regarding comparison		
6/09/16	JMS	Conference with Sharon J. Sobers regarding discovery requests to Kroger; Revise the same		
6/09/16	SJS	Conference with Emma F. Paxton regarding hours and rate for Kaiser time, Email to Joshua M. Smith regarding the same		
6/09/16	SJS	Review Joshua M. Smith draft of discovery requests to Kroger, conference with Joshua M. Smith regarding admissions, interrogatories, and document requests, conference with Joshua M. Smith regarding review of document requests to Kroger		
6/10/16	EFP	Conference with Peter A. Saba and Josh M. Smith regarding notices to potential opt-ins		

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6/10/16	JMS	Conference with Sharon J. Sobers and Peter A. Saba regarding Defendant's responses to proposed agreed notice; Draft responses to the same; Conference with Peter A. Saba regarding the same; Correspondence with opposing counsel regarding pending response		
6/10/16	PAS	Review correspondence from opposing counsel; Conference with Josh M. Smith and Sharon J. Sobers regarding issues with conditional certification and notice to putative class		
6/10/16	SJS	Conference with Peter A. Saba, Joshua M. Smith and Emma F. Paxton regarding issues related to collective action or class certification		
6/13/16	JMS	Draft and revise response to opposing counsel's terms of agreed notice; Conference with Peter A. Saba and Sharon J. Sobers regarding the same		
6/13/16	PAS	Review and revise correspondence to opposing counsel; Receipt and review of correspondence from opposing counsel		
6/14/16	EFP	Make changes to discovery requests		
6/14/16	JMS	Revise discovery requests to defendant		
6/14/16	JMS	Correspondence to Madeline Hickey regarding discovery responses		
6/14/16	JMS	Revise discovery responses of Derek Chipman		
6/14/16	JMS	Attempt telephone conference with Derek Chipman		
6/14/16	SJS	Review and revise Joshua M. Smith's revisions to discovery requests to Kroger		
6/15/16	JMS	Correspondence with Sharon J. Sobers regarding draft discovery requests		
6/15/16	JMS	Receipt and review of Defendant's memorandum in opposition to motion to certify		
6/15/16	JMS	Legal research regarding multiple notice and discovery of email addresses Legal research regarding multiple notice and discovery of email addresses		
6/15/16	SJS	Review Joshua M. Smith's changes to discovery; Email to Joshua M. Smith regarding additional changes		
6/16/16	JMS	Conference with Sharon J. Sobers regarding discovery requests to Defendant; Revise discovery requests to defendant; Correspondence to Peter A. Saba regarding the same		

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6/16/16	SJS	Review defendant's response to motion for conditional certification of collective action; Conference with Joshua M. Smith regarding the same and status of discovery in light of memorandum in opposition		
6/17/16	JMS	Revise discovery responses to Kroger		
6/20/16	JMS	Review Facebook message responses from Derek Chipman; Conference with Peter A. Saba and Sharon J. Sobers regarding the same; Legal research regarding client communications with putative class members		
6/20/16	SJS	Review Derek Chipman's Facebook posts; Conference with Joshua M. Smith regarding the same		
6/21/16	JMS	Correspondence with Madeline Hickey regarding discovery responses; Receipt and review of the same		
6/22/16	JMS	Revise discovery responses of Derek Chipman; Correspondence with Sharon J. Sobers regarding the same		
6/22/16	JMS	Draft memo to file regarding deleted text messages from client		
6/22/16	SJS	Locate privilege log and finish initial review of Chipman discovery; Redline Chipman's discovery responses		
6/23/16	JMS	Draft and revise discovery responses		
6/24/16	JMS	Correspondence with opposing counsel regarding discovery		
6/24/16	PAS	Receipt and review of correspondence from opposing counsel		
6/28/16	JMS	Telephone conference with Sharon J. Sobers regarding notice of collective action and disputed language		
6/28/16	SJS	Legal research regarding information needed for sending notices		
6/29/16	SJS	Research regarding equitable tolling, notice, and information regarding sending notice; Email to Peter A. Saba and Josh M. Smith		
6/30/16	EFP	Log documents from the clients		
6/30/16	SJS	Review discovery to Kroger for additional time, review exhibits		
6/30/16	SJS	Review discovery responses of all plaintiffs		
6/30/16	SJS	Review and revise discovery requests to defendant and exhibits		
6/30/16	SJS	Conference with Emma F. Paxton regarding document log		

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6/30/16	SJS	Email to Joshua M. Smith regarding discovery responses for all plaintiffs		
6/30/16	SJS	Email to Joshua M. Smith regarding discovery requests		
6/30/16	SJS	Review Eversole decision on work product privilege		
7/01/16	PAS	Conference with Sharon J. Sobers regarding issues with discovery		
7/05/16	PAS	Review memorandum in opposition to motion for conditional certification		
7/05/16	PAS	Review applicable case law for standard of review concerning decertification discovery		
7/05/16	PAS	Review current available documentation regarding similarly situated standard		
7/05/16	PAS	Review and revise discovery requests		
7/06/16	JMS	Conference with Peter A. Saba regarding discovery requests to defendant and revisions; Revise the same		
7/06/16	PAS	Conference with Josh M. Smith regarding changes to discovery		
7/06/16	PAS	Outline all areas of written discovery and information needed		
7/07/16	JMS	Revise discovery requests to defendant; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same; Telephone conference with Sharon J. Sobers regarding discovery requests		
7/07/16	PAS	Draft and revise discovery requests; Conference with Sharon J. Sobers regarding issues with splitting requests		
7/07/16	SJS	Review changes to discovery		
7/08/16	EFP	Review and revise discovery requests to defendant, correspondence to opposing counsel regarding discovery requests, email to the clients regarding discovery requests		
7/08/16	JMS	Revise discovery requests; Correspondence to Peter A. Saba regarding the same; Correspondence to Sharon J. Sobers regarding the same; Telephone conference with Sharon J. Sobers regarding the same		
7/08/16	PAS	Review and revise discovery requests		
7/08/16	SJS	Review Peter A. Saba's revised version of discovery requests to Kroger		

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Date	Int	Professional Services	Hours	Amount
7/11/16	EFP	Conference with Sharon J. Sobers regarding document production and prepare document production		
7/11/16	JMS	Revise reply in support of motion for conditional certification		
7/11/16	SJS	Review discovery responses, conference with Emma F. Paxton regarding organization of documents in file		
7/11/16	SJS	Draft reply to defendant's response to collective action certification regarding notice language and procedures		
7/12/16	JMS	Review Sharon J. Sobers' revisions to reply in support of motion for conditional certification; Conference with Sharon J. Sobers regarding the same		
7/12/16	SJS	Review and revise reply in support of class certification regarding notice; Draft affidavit for Joshua M. Smith to accompany reply in support; Cite check reply in support of certification		
7/13/16	EFP	Conference with Sharon J. Sobers regarding document production and prepare documents for production		
7/13/16	JMS	Revise reply in support of motion for conditional certification; Correspondence to Sharon J. Sobers regarding the same		
7/13/16	SJS	Review Joshua M. Smith's changes to reply to motion to certify regarding notice, review and revise reply		
7/13/16	SJS	Draft email to Joshua M. Smith regarding equitable tolling		
7/13/16	SJS	Review documents for production to defendant, review documents in connection with answers to document requests, conference with Joshua M. Smith regarding inclusion of documents that were not in initial exhibit list, conference with Emma F. Paxton regarding preparation of documents for production, conference with Joshua M. Smith regarding revisions of discovery responses and settlement demand		
7/14/16	EFP	Revise discovery responses and prepare documents for production		
7/14/16	JMS	Revise draft discovery responses		
7/14/16	SJS	Revise Chipman's discovery responses, conference with Emma F. Paxton regarding formatting responses for Chipman and other named plaintiffs, review Burchett notes for redactions, identify items that will be different for the different Plaintiffs for double checking differences in responses, add notes to Chipman responses regarding rationale for response		

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7/14/16	SJS	Legal research regarding Anderson v. Mt. Clemons Pottery (plaintiff testimony regarding hours worked)		
7/14/16	SJS	Review and revise Emma F. Paxton's formatting of discovery responses, email to Joshua M. Smith regarding same		
7/14/16	SJS	Continue legal research regarding Mt. Clemens Pottery/employee testimony regarding hours worked, email to Joshua M. Smith x2 regarding status and memo regarding legal research regarding what evidence FLSA employee needs to establish time worked		
7/15/16	EFP	Finalize reply in support of motion for conditional certification and supporting affidavit and file same, email to the clients regarding reply in support of motion for conditional certification		
7/15/16	JMS	Revise reply in support of motion for conditional certification		
7/15/16	PAS	Review and revise reply in support of conditional certification		
7/15/16	PAS	Conference with Josh M. Smith regarding changes to reply brief		
7/15/16	PAS	Receipt and review of correspondence from the Court		
7/18/16	JMS	Correspondence with opposing counsel regarding extension to discovery responses and deposition dates for Diana Victoriano		
7/19/16	EFP	Receipt and review of order regarding motion for conditional certification from the Court, email to the clients regarding order		
7/19/16	PAS	Receipt and review of correspondence from the Court; Receipt and review of correspondence from opposing counsel; Conference with Josh M. Smith regarding issues with the Court's decision		
7/19/16	SJS	Conference with Joshua M. Smith regarding court order certifying class		
7/19/16	SJS	Review protective order and other protective orders for supplementation		
7/20/16	EFP	Review process for filing under seal		
7/20/16	JMS	Conference with Sharon J. Sobers regarding agreed protective order		
7/20/16	SJS	Conference with Joshua M. Smith regarding protective order and sealing documents		
7/21/16	JMS	Receipt and review of article from Christopher R. Jones regarding Fair Credit Reporting Act litigation against Kroger; Conference with Sharon J. Sobers regarding the same		

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7/22/16	JMS	Draft memo to file regarding Fair Credit Reporting Act lawsuit against Kroger; Correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
7/22/16	JMS	Revise protective order		
7/22/16	JMS	Correspondence to Peter A. Saba regarding the same		
7/22/16	PAS	Receipt and review of correspondence from opposing counsel		
7/22/16	SJS	Review protective order; Conference with Joshua M. Smith regarding protective order		
7/25/16	EFP	Review deadlines in collective action certification order		
7/25/16	SJS	Review calendar order		
7/25/16	SJS	Review Joshua Smith changes to Protective Order		
7/28/16	EFP	Email to Peter A. Saba regarding protective order		
7/28/16	PAS	Review and revise agreed protective order		
7/29/16	PAS	Finalize protective order		
8/01/16	JMS	Conference with Peter A. Saba regarding stipulated protective order; Revise protective order; Correspondence to Sharon J. Sobers regarding the same; Correspondence to opposing counsel regarding the same		
8/01/16	PAS	Receipt and review of correspondence from opposing counsel x2		
8/01/16	PAS	Conference with Josh M. Smith regarding changes to protective order		
8/01/16	PAS	Review and revise protective order		
8/01/16	SJS	Review changes by Peter A. Saba and Joshua M. Smith to protective order, conference with Joshua M. Smith regarding the same		
8/02/16	EFP	Receipt and review of correspondence from the Court regarding stipulated protective order		
8/02/16	EFP	Review spreadsheet of current and former employees and prepare envelopes for notice		
8/02/16	JMS	Receipt and review of confidential putative class list; Conference with Sharon J. Sobers regarding the same		
8/02/16	JMS	Revise collective action notice; Draft memo to Peter A. Saba, Sharon J. Sobers, and Emma F. Paxton regarding the same		

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8/02/16	PAS	Receipt and review of correspondence from the Court		
8/02/16	PAS	Receipt and review of correspondence from opposing counsel		
8/02/16	PAS	Conference with Josh M. Smith regarding issues with notices		
8/02/16	SJS	Review time to propose for progress of litigation, review list of addresses from defendant, conference with Joshua M. Smith regarding same		
8/02/16	SJS	Email comments on discovery to Joshua M. Smith		
8/03/16	EFP	Prepare envelopes for sending notices, draft and revise notice log, telephone conference with phone provider regarding new phone line (vm) and email to phone provider regarding new phone line		
8/03/16	JMS	Receipt and review of correspondence from opposing counsel regarding proposed calendar order; Correspondence to opposing counsel regarding the same		
8/03/16	JMS	Correspondence to Madeline Hickey regarding document production		
8/03/16	PAS	Conference with Josh M. Smith and Emma F. Paxton regarding issues with notices and consent forms for putative class		
8/03/16	PAS	Receipt and review of correspondence from opposing counsel		
8/03/16	SJS	Review dates for proposed calendar order in FLSA litigation with Joshua M. Smith		
8/04/16	EFP	Email to the clients regarding protective order, telephone conference with phone provider x2 regarding new line and conference with phone provider to set up new line, draft and revise notice log		
8/04/16	JMS	Conference with Peter A. Saba regarding discovery responses; Revise responses		
8/04/16	JMS	Conference with Peter A. Saba and Emma F. Paxton regarding notices		
8/04/16	JMS	Draft script for voicemail to collective action phone line		
8/04/16	JMS	Correspondence to opposing counsel regarding proposed calendar order and telephone conference		
8/04/16	PAS	Receipt and review of correspondence from the Court		
8/04/16	PAS	Draft and revise discovery responses		

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8/05/16	EFP	Revise cover letter and class action notice regarding phone number; Finalize discovery responses; Prepare documents for production; Correspondence to opposing counsel regarding discovery responses; Emails to opposing counsel regarding discovery responses; Emails to the clients regarding discovery responses		
8/05/16	EFP	Finalize discovery responses		
8/05/16	EFP	Prepare documents for production		
8/05/16	EFP	Correspondence to opposing counsel regarding discovery responses		
8/05/16	EFP	Emails to opposing counsel regarding discovery responses		
8/05/16	EFP	Emails to the clients regarding discovery responses		
8/05/16	JMS	Conference with Peter A. Saba regarding discovery responses; Revise responses to discovery		
8/05/16	JMS	Review documents to be produced to opposing counsel; Conference with Emma F. Paxton regarding the same		
8/05/16	PAS	Receipt and review of correspondence from the client		
8/05/16	PAS	Review documents for production		
8/05/16	SJS	Conference with Joshua M. Smith regarding schedule/planning and Kroger's discovery responses		
8/05/16	SJS	Conference with Shiela Smith, Esq. regarding Swigert litigation proposed calendar for collective/class certification		
8/08/16	JMS	Telephone conference with opposing counsel regarding calendar order; Conference with Peter A. Saba and Sharon J. Sobers regarding the same; Draft and revise proposed calendar order to opposing counsel		
8/08/16	PAS	Receipt and review of correspondence from opposing counsel		
8/08/16	PAS	Conference with opposing counsel regarding issues with scheduling		
8/08/16	PAS	Review and revise email to opposing counsel		
8/08/16	SJS	Conference with Peter A. Saba and Joshua M. Smith regarding scheduling order for balance of collective action certification, conference with opposing counsel regarding scheduling order, conference with Peter A. Saba and Joshua M. Smith regarding next steps, review email from Joshua M. Smith regarding wording for response to the Court regarding dates for scheduling order		

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8/08/16	SJS	Review notice documents for FLSA class, conference with Joshua M. Smith regarding Hardesty job and phone number on revised notice		
8/09/16	JMS	Receipt and review of correspondence from opposing counsel regarding proposed calendar; Conference with Peter A. Saba and Sharon J. Sobers regarding the same; Revise proposed calendar order; Correspondence to opposing counsel regarding the same		
8/09/16	PAS	Receipt and review of correspondence from opposing counsel x3		
8/09/16	PAS	Conference with Josh M. Smith regarding changes to proposed scheduling order		
8/09/16	SJS	Email Joshua M. Smith and Peter A. Saba response to email from opposing counsel regarding email to the Judge regarding scheduling order, conference with Joshua M. Smith regarding responding to email from opposing counsel regarding proposed scheduling order for the Judge		
8/10/16	EFP	Revise and print out of deposition exhibit relating to CoRE Office Layout		
8/10/16	JMS	Review finalized notice; Conference with Peter A. Saba regarding the same; Revise notice; Correspondence to opposing counsel regarding the same		
8/10/16	PAS	Receipt and review of correspondence from the Court; Review changes to notice		
8/10/16	SJS	Calculate overtime from staffed time on database from defendant; Conference with Joshua M. Smith regarding the same		
8/11/16	EFP	Prepare notices for mailing to potential class members, review list of recruiters and weekly time, create spreadsheet of weekly time less lunch breaks		
8/11/16	JMS	Draft initial disclosures		
8/11/16	JMS	Review call metric data in determining damages/overtime		
8/11/16	JMS	Final review notice documents		
8/11/16	PAS	Receipt and review of correspondence from opposing counsel x3		
8/11/16	PAS	Conference with Josh M. Smith regarding initial disclosures		

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8/12/16	EFP	Review addresses and letters; Finalize and mail notices to potential class members; Emails to former recruiters regarding notices; Record voicemail for class phone line; Finalize initial disclosures; Email to opposing counsel regarding initial disclosures; Email to the client regarding initial disclosures		
8/12/16	EFP	Record voicemail for class phone line		
8/12/16	EFP	Finalize initial disclosures		
8/12/16	EFP	Email to opposing counsel regarding initial disclosures		
8/12/16	EFP	Email to the client regarding initial disclosures		
8/12/16	JMS	Review and confirm mailing addresses with respect to opt-in notices to putative class members		
8/12/16	PAS	Review and revise telephone script for voicemail		
8/12/16	PAS	Conference with Josh M. Smith regarding changes to script		
8/15/16	EFP	Receipt and review of signed consent from Jeremy Hadden; Email to Jeremy Hadden		
8/15/16	EFP	Receipt and review of email regarding incorrect email address		
8/15/16	EFP	Calendar scheduling order		
8/15/16	EFP	Email to the clients regarding discovery responses, initial disclosures, and calendar order		
8/15/16	EFP	Telephone conference with the Court regarding status conference		
8/15/16	SJS	Review prior emails regarding resolution of schedule for litigation; Conference with Joshua M. Smith regarding extension to respond to current requests from defendant in light of prior discussions		
8/16/16	EFP	Revise and finalize spreadsheet of time records		
8/17/16	JMS	Legal research regarding communications with potential class members; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
8/18/16	EFP	Calculate hours of overtime for recruiters		
8/18/16	JMS	Correspondence with Sharon J. Sobers regarding damages calculation based on telephone records		
8/19/16	JMS	Receipt and review of opt-in consent form from Rhondalyn West		

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8/19/16	JMS	Attempt telephone conference with Ms. West		
8/19/16	JMS	Legal research regarding opt-in consent forms and filing deadlines		
8/19/16	PAS	Receipt and review of correspondence from opt in		
8/22/16	JMS	Receipt and review of opt-in consent form; Correspondence with Sharon J. Sobers and Peter A. Saba regarding the same		
8/22/16	JMS	Revise witness questionnaire and correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
8/22/16	PAS	Review third opt in client		
8/24/16	JMS	Correspondence to opt-in plaintiffs x3 regarding follow-up telephone calls		
8/25/16	EFP	Receipt and review of returned mail to Jaclynn Olnhausen and Kenea Deckle (potential opt ins) and update notice log		
8/25/16	JMS	Telephone conference with opt-in plaintiff Jeremy Hadden; Correspondence to Sharon J. Sobers regarding the same		
8/25/16	PAS	Review correspondence from opt in		
8/26/16	EFP	Update notice spreadsheet regarding Jessica Conroy opt in		
8/26/16	JMS	Correspondence with opt-in plaintiff Rhondalyn West		
8/26/16	PAS	Receipt and review of correspondence from opposing counsel		
8/26/16	PAS	Conference with Josh M. Smith regarding communications with opt-ins		
8/29/16	EFP	Receipt and review of consent form from Craig McIntire		
8/29/16	EFP	Receipt and review of returned mail from potential opt ins		
8/29/16	EFP	Compare ADEA spreadsheet to FLSA spreadsheet regarding missing potential opt ins		
8/29/16	EFP	Review Lane v. Pickerington docket		
8/29/16	JMS	Telephone conference with opt-in plaintiff Rhondalyn West; Draft memo to file regarding interview with Rhondalyn West		
8/29/16	JMS	Draft memo to file regarding interview with Jeremy Hadden		
8/29/16	JMS	Legal research regarding informational website setup		

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8/29/16	JMS	Telephone conference with Sebastien Hue regarding website setup; Correspondence with Peter A. Saba regarding the same		
8/29/16	JMS	Receipt and review of documentation of missing recruiters on class notice list		
8/29/16	PAS	Review interview memo		
8/29/16	PAS	Review consent form from opt in		
8/29/16	PAS	Receipt and review of correspondence from potential opt in		
8/29/16	PAS	Conference with Josh M. Smith regarding issues with faulty name disclosure		
8/29/16	SJS	Review Joshua M. Smith's notes regarding Rondalynn West, review list of recruiters for information on Rondalynn West, email to Joshua M. Smith regarding the same		
8/29/16	SJS	Respond to Joshua M. Smith regarding email from Kroger recruiter who did not get FLSA mailing, conference with Peter A. Saba regarding filing to extend time for opt-ins to respond in light of inaccuracies in recruiter lists, email to Joshua M. Smith regarding the same		
8/29/16	SJS	Review legal research regarding website information		
8/29/16	SJS	Email to Joshua M. Smith regarding Espenscheid decision		
8/29/16	SJS	Conference with Joshua M. Smith regarding website and filing motion regarding recruiter list inaccuracies		
8/30/16	EFP	Receipt and review of consent form from Matt Taske, receipt and review of returned mail from Madeline Hickey and Kathryn Mahoney		
8/30/16	JMS	Draft and revise correspondence to opposing counsel regarding deficiencies in class member list; Conference with Peter A. Saba regarding the same; Correspondence with Sharon J. Sobers regarding the same		
8/30/16	JMS	Legal research regarding Court-imposed sanctions for failure to disclose potential opt-in class members		
8/30/16	PAS	Conference with Josh M. Smith regarding issues with resolution of Kroger's failure to disclosure names of employees and correspondence to opposing counsel		

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8/30/16	SJS	Review Joshua M. Smith's letter to opposing counsel regarding problems with FLSA recruiter list; Legal research regarding problems with class certification lists; Review brief regarding class action certification; Conference with Joshua M. Smith regarding letter to opposing counsel regarding issues with recruiter list; Email to Peter A. Saba regarding the same; Review Judge Black's procedural orders regarding handling disputes; Email to Joshua M. Smith regarding the same		
8/31/16	JMS	Telephone conference with opposing counsel x2 regarding rescheduling call; Conference with Sharon J. Sobers regarding the same		
8/31/16	SJS	Review what is needed for class action motion to certify		
9/01/16	SJS	Review class action initial draft		
9/02/16	EFP	Draft and revise list of recruiters for letter to opposing counsel		
9/02/16	JMS	Revise letter to opposing counsel regarding class notice list and deficiencies; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
9/02/16	PAS	Review opt in resignation letter; Revise correspondence to opposing counsel regarding recruiter list issues		
9/06/16	EFP	Finalize correspondence to opposing counsel regarding failure to disclose, email to opposing counsel regarding failure to disclose and email to the client regarding correspondence to opposing counsel		
9/06/16	JMS	Revise correspondence to opposing counsel regarding notice deficiencies; Correspondence to Emma F. Paxton regarding the same		
9/06/16	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding class website setup		
9/06/16	JMS	Telephone conference with opt-in plaintiff Wahid Lewis		
9/06/16	JMS	Telephone conference with Peter A. Saba regarding telephone conference with opposing counsel on notice issue		
9/06/16	JMS	Telephone conference with Sharon J. Sobers regarding discovery and extension of dates		
9/06/16	PAS	Receipt and review of correspondence from the client regarding issues with putative class disclosure		
9/06/16	SJS	Review Peter A. Saba's changes to letter regarding missed potential opt-ins on Kroger's list identifying recruiters		

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9/06/16	SJS	Conference with Joshua M. Smith regarding date for conference regarding names missing from opt-in list, extension on defendant's request for discovery from current opt-ins, and changing date for court ordered conference following our receipt of discovery		
9/07/16	JMS	Correspondence to opposing counsel regarding extension of time and notice issue; Telephone conference with opposing counsel regarding the same		
9/07/16	JMS	Draft memo to file regarding call with opposing counsel; Correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
9/07/16	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding telephone conference with opposing counsel and terms for notice deficiency		
9/07/16	PAS	Receipt and review of correspondence from opposing counsel; Review issues for conference call with opposing counsel		
9/07/16	SJS	Conference with Joshua M. Smith regarding conference with opposing counsel regarding extension of time to respond to discovery directed to opt-ins and issues with recruiter list; Compare list of potential missed opt-ins with time worked on ADEA list regarding part-time status; Review summary of deficiency letter conversation with opposing counsel		
9/08/16	EFP	Draft and revise notice of filing consents to become party-plaintiff and file same, correspondence to opposing counsel regarding notice of filing consents and email to opposing counsel regarding notice of filing consents; Email to the client regarding notice of filing consents; Update consent log		
9/08/16	JMS	Prepare for and attend telephone conference with opposing counsel regarding notice list deficiencies		
9/08/16	JMS	Draft additional discovery requests and correspondence to opposing counsel regarding alleged temporary employees; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
9/08/16	JMS	Legal research regarding opt-in plaintiff rates		
9/08/16	PAS	Review documents for conference call		
9/08/16	PAS	Conference call with opposing counsel regarding issues with employee information		

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9/08/16	PAS	Receipt and review of correspondence from the Court x2		
9/08/16	SJS	Conference with Joshua M. Smith and Peter A. Saba regarding upcoming conference with opposing counsel, conference with opposing counsel regarding missed opt-ins on list		
9/08/16	SJS	Review Joshua M. Smith's letter regarding discovery related to "temporary" employees at CoRE, review discovery requests regarding temporary employees		
9/09/16	JMS	Revise correspondence and discovery requests to opposing counsel regarding temporary employees		
9/09/16	JMS	Receipt and review of discovery responses from opposing counsel		
9/09/16	PAS	Receipt and review of correspondence from the Court		
9/12/16	EFP	Email to the clients regarding discovery responses		
9/12/16	JMS	Receipt and review of correspondence from opposing counsel regarding telephone conference		
9/12/16	JMS	Correspondence to Emma F. Paxton regarding scheduling of conference call		
9/12/16	JMS	Telephone conference with the client regarding Kroger discovery responses		
9/12/16	JMS	Telephone conference with Sharon J. Sobers regarding Kroger discovery responses and issues with notice		
9/12/16	JMS	Review of documents produced by Kroger		
9/12/16	JMS	Correspondence with Sebastien Hue regarding website		
9/12/16	PAS	Receipt and review of correspondence from opposing counsel		
9/12/16	SJS	Review defendant's written responses to interrogatories and production of documents; Review materials for conference call regarding missing opt-ins; Review document production		
9/13/16	EFP	Finalize correspondence to opposing counsel regarding temporary employees; Finalize discovery requests; Review and log documents produced by opposing counsel; Email to opposing counsel regarding temporary employee letter and discovery requests; Email to the client regarding letter to opposing counsel and discovery requests		
9/13/16	EFP	Revise and finalize discovery requests		

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9/13/16	EFP	Review and log documents produced by opposing counsel		
9/13/16	EFP	Email to opposing counsel regarding temporary employee letter and discovery requests		
9/13/16	EFP	Email to the client regarding letter to opposing counsel and discovery requests		
9/13/16	JMS	Meeting with Sharon J. Sobers and Peter A. Saba regarding notice issues		
9/13/16	JMS	Telephone conference with opposing counsel regarding class notice issues		
9/13/16	JMS	Review documents produced by defendant		
9/13/16	JMS	Telephone conference with opt-in plaintiff Rhonda Furr; Correspondence to Sharon J. Sobers regarding the same		
9/13/16	JMS	Telephone conference with the client regarding status update		
9/13/16	JMS	Telephone conference with opposing counsel regarding aux code reports		
9/13/16	JMS	Receipt and review of the same		
9/13/16	PAS	Conference with Josh M. Smith and Sharon J. Sobers regarding issues with notice period		
9/13/16	PAS	Review and revise temporary employee discovery		
9/13/16	PAS	Conference call with opposing counsel regarding issues with missing opt ins on list		
9/13/16	PAS	Receipt and review of correspondence from opposing counsel		
9/13/16	SJS	Meeting with Peter A. Saba and Joshua M. Smith in preparation for telephone conference with opposing counsel regarding missing opt-ins; Telephone conference with Peter A. Saba and Joshua M. Smith regarding resolving missing opt-in issues		
9/14/16	EFP	Review and log documents from opposing counsel		
9/14/16	JMS	Correspondence with Emma F. Paxton regarding additional notice to omitted class members		
9/14/16	JMS	Correspondence with Peter A. Saba and Emma F. Paxton regarding notes from witness interview with Rhonda Furr (opt-in)		

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9/14/16	JMS	Draft and revise deficiency letter regarding defendant's responses to discovery requests; Correspondence to Sharon J. Sobers regarding the same		
9/14/16	JMS	Telephone conference with Sebastien Hue regarding website; Correspondence to Peter A. Saba regarding the same		
9/14/16	PAS	Receipt and review of correspondence from opposing counsel		
9/14/16	SJS	Review discovery requests to opt-ins in preparation for conference with opposing counsel regarding discovery; Review topics for discussion at conference; Prepare for conference with opposing counsel regarding discovery		
9/15/16	EFP	Cross-reference spreadsheets produced by opposing counsel with putative class list; Revise spreadsheet of aux times; Finalize correspondence to opposing counsel regarding list of individuals; Email to opposing counsel regarding list of individuals; Email to the client regarding letter to opposing counsel		
9/15/16	EFP	Revise spreadsheet of aux times		
9/15/16	EFP	Revise and finalize correspondence to opposing counsel regarding list of individuals		
9/15/16	EFP	Email to opposing counsel regarding list of individuals		
9/15/16	EFP	Email to the client regarding letter to opposing counsel		
9/15/16	JMS	Correspondence to Peter A. Saba regarding discovery telephone conference with opposing counsel; Telephone conference with opposing counsel regarding discovery plan; Conference with Sharon J. Sobers and Peter A. Saba regarding the same; Prepare for telephone conference with opposing counsel		
9/15/16	JMS	Receipt and review of correspondence to Sebastien Hue regarding website; Conference with Peter A. Saba regarding the same		
9/15/16	JMS	Draft correspondence to opposing counsel regarding list of individuals identified as being omitted from putative class list		
9/15/16	JMS	Multiple telephone conferences with the named plaintiffs regarding deposition availability; Correspondence to Peter A. Saba regarding the same		
9/15/16	PAS	Conference with Josh M. Smith regarding issues with witnesses and discovery		

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9/15/16	PAS	Conference call with opposing counsel regarding issues with timing of discovery		
9/15/16	PAS	Conference with Josh M. Smith and Sharon J. Sobers regarding issues with notice		
9/15/16	SJS	Review BNA FLSA cases (Senne, Kaur 9thCir), email to Joshua M. Smith regarding the same		
9/15/16	SJS	Conference with opposing counsel pursuant to the Court's scheduling order regarding discovery, conference with Peter A. Saba and Joshua M. Smith following conference with opposing counsel regarding written discovery, depositions, and notice issues		
9/15/16	SJS	Draft task list, conference with Joshua M. Smith regarding division of tasks		
9/15/16	SJS	Review email from opposing counsel regarding deficiency letter with respect to certain requested items, email to Emma F. Paxton		
9/15/16	SJS	Email to Emma F. Paxton regarding list of missing opt-ins and requesting list of individuals from defendant's list of missing opt-ins		
9/15/16	SJS	Conference with Joshua M. Smith regarding current task list		
9/16/16	EFP	Review aux spreadsheets regarding additional recruiters and log documents produced by opposing counsel		
9/19/16	EFP	Emails with opposing counsel regarding word versions of discovery requests to opt ins		
9/19/16	EFP	Review and log documents produced by opposing counsel		
9/19/16	JMS	Revise supplemental cover letter to opt-in plaintiffs		
9/19/16	JMS	Review documents produced to date by Kroger; Correspondence to Sharon J. Sobers regarding the same		
9/19/16	JMS	Revise cover letter to opt-in plaintiffs regarding discovery requests		
9/19/16	PAS	Receipt and review of correspondence from opposing counsel regarding discovery issues		

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9/19/16	SJS	Draft proposed language for belated opt-in notices; Draft cover letters for the opt-in discovery; Forward cover letter to Joshua M. Smith; Review Bates numbers for spreadsheets proposed by opposing counsel; Review lists of names of supplemental opt-ins; Conference with Joshua M. Smith regarding the same and proposed unified list of individuals with notice issues		
9/20/16	EFP	Make changes to supplemental notice letter, review and log documents produced by opposing counsel, finalize letter to opt-in plaintiffs regarding discovery requests and emails to opt-in plaintiffs regarding discovery requests		
9/20/16	JMS	Correspondence with named plaintiffs regarding deposition dates; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
9/20/16	JMS	Revise correspondence to opt-in plaintiffs regarding discovery requests		
9/20/16	JMS	Receipt and review of correspondence from opposing counsel regarding aux time sheets		
9/20/16	PAS	Receipt and review of correspondence from opposing counsel		
9/20/16	PAS	Review correspondence to opt-in clients		
9/20/16	PAS	Conference with Josh M. Smith regarding communication with new opt-ins		
9/21/16	JMS	Telephone conference with the client regarding status update; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
9/21/16	JMS	Correspondence with Sharon J. Sobers and Peter A. Saba regarding deposition dates		
9/22/16	JMS	Receipt and review of discovery requests to additional opt-in plaintiffs		
9/22/16	JMS	Draft generic responses to opt-in plaintiff discovery requests		
9/22/16	PAS	Receipt and review of correspondence from opposing counsel		
9/23/16	JMS	Correspondence with Amanda Gayhart regarding opt-in discovery requests; Telephone conference with Amanda Gayhart regarding the same		
9/26/16	EFP	Revise supplemental notice letter		
9/26/16	JMS	Revise supplemental notice letter to additional class members		

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9/26/16	JMS	Telephone conference with the client regarding status update		
9/26/16	JMS	Correspondence with Sebastien Hue regarding website; Correspondence to Peter A. Saba regarding the same		
9/26/16	PAS	Review and revise supplemental notice; Conference with Josh M. Smith regarding changes to supplemental notice for omitted opt ins		
9/27/16	EFP	Review documents from Amanda Gayhart		
9/27/16	JMS	Correspondence with opposing counsel regarding supplemental notice		
9/27/16	JMS	Receipt and review of discovery responses from opposing counsel with respect to temporary employees		
9/27/16	JMS	Conference with Amanda Gayhart regarding discovery responses		
9/27/16	JMS	Review documents produced in discovery		
9/27/16	PAS	Receipt and review of correspondence from opposing counsel x2 regarding discovery and supplemental notice		
9/28/16	EFP	Review consent from Jalen Johnson and update notice log		
9/28/16	JMS	Receipt and review of correspondence from opposing counsel regarding supplemental notice letter; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same;		
9/28/16	JMS	Review documents produced by opposing counsel		
9/29/16	JMS	Draft 30(b)(6) deposition in conjunction with all Kroger policies with respect to CoRE Recruiters; Review documents produced in conjunction with drafting 30(b)(6) deposition		
9/30/16	JMS	Conference with Peter A. Saba regarding notice to additional putative class members; Revise the same; Correspondence to opposing counsel regarding the same		
9/30/16	JMS	Revise 30(b)(6) notice of deposition		
9/30/16	PAS	Conference with Josh M. Smith regarding review of supplemental notice and agreed order		
9/30/16	PAS	Review and revise 30(b)(6)		
10/03/16	JMS	Receipt and review of correspondence from opposing counsel regarding agreed order; Correspondence to Peter A. Saba regarding the same		
10/04/16	JMS	Revise responses to opt-in discovery requests		

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10/05/16	EFP	Finalize supplemental notice documents		
10/05/16	JMS	Correspondence with opposing counsel regarding agreed order; Telephone conference with the Court regarding the same; Correspondence to Emma F. Paxton regarding agreed order and exhibit		
10/05/16	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding email status update to current opt-in plaintiffs		
10/05/16	JMS	Correspondence to the court regarding proposed agreed order		
10/06/16	EFP	Finalize supplemental notice letters		
10/06/16	PAS	Receipt and review of correspondence from the Court; Conference regarding website modifications and issues		
10/07/16	EFP	Receipt and review of discovery responses and production, review and log documents from opposing counsel		
10/10/16	EFP	Review deadline for opt-in discovery responses		
10/10/16	JMS	Telephone conference with Peter A. Saba regarding supplemental opt-in notices and follow-up		
10/10/16	JMS	Correspondence to Peter A. Saba regarding website		
10/10/16	JMS	Revise discovery responses of Amanda Gayhart; Correspondence to Peter A. Saba regarding the same		
10/11/16	JMS	Receipt and review of multiple correspondence from opt-in plaintiffs regarding discovery requests		
10/11/16	PAS	Conference with Jeffrey M. Nye regarding deposition preparation and litigation issues		
10/13/16	JMS	Correspondence with opposing counsel regarding discovery requests and depositions		
10/17/16	EFP	Review contract for website development and draft and revise check request for website development		
10/17/16	JMS	Telephone conference with Jeffrey M. Nye regarding inspection of premises; Correspondence to Peter A. Saba regarding the same		
10/17/16	JMS	Correspondence with Madeline Hickey regarding deposition dates; Correspondence to opposing counsel regarding the same		
10/17/16	JMS	Correspondence to Peter A. Saba regarding website and contract agreement		

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10/18/16	JMS	Telephone conference with Peter A. Saba regarding inspection of premises; Legal research regarding Rule 34 inspection of premises; Correspondence to opposing counsel regarding the same		
10/19/16	EFP	Receipt and review of returned mail from Marcus LaCour, update notice log regarding new address for LaCour and Corbin Hom consent		
10/19/16	JMS	Correspondence with Rhonda Furr regarding discovery requests; Revise the same		
10/21/16	JMS	Correspondence with Michael Kovatch regarding discovery requests		
10/21/16	JMS	Correspondence to opposing counsel regarding deposition of Madeline Hickey, Joseph Hardesty, and Derek Chipman		
10/21/16	JMS	Multiple correspondences with the named plaintiffs regarding deposition dates and scheduling		
10/21/16	JMS	Receipt and review of documents produced by Michael Kovatch in response to requests for document production		
10/24/16	JMS	Revise draft discovery responses from opt-in plaintiffs; Telephone conference with opposing counsel regarding discovery responses and extension; Correspondence to opposing counsel regarding the same		
10/24/16	PAS	Receipt and review of correspondence from opposing counsel		
10/25/16	EFP	Telephone conference with potential opt-in Jeanne George regarding deadline and pdate notice log		
10/26/16	JMS	Correspondence with opt-in plaintiffs (Furr, Matibiri, Kovatch, Burchett, Bradley) regarding discovery responses		
10/26/16	JMS	Revise discovery responses		
10/26/16	JMS	Draft correspondence to second set of opt-in plaintiffs regarding discovery requests; Correspondence to Peter A. Saba regarding the same		
10/27/16	EFP	Review emails regarding Kimberly Burchett discovery responses; Finalize opt-in discovery responses; Prepare documents for production to opposing counsel; Correspondence to opposing counsel regarding discovery responses		
10/27/16	EFP	Revise and finalize opt-in discovery responses		
10/27/16	EFP	Prepare documents for production to opposing counsel		
10/27/16	EFP	Correspondence to opposing counsel regarding discovery responses		

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10/27/16	JMS	Multiple correspondence with opt-in plaintiffs regarding discovery responses; Correspondence to Peter A. Saba regarding the same; Revise opt-in discovery responses		
10/27/16	PAS	Review discovery responses		
10/28/16	JMS	Telephone conference with Dominic Martin regarding opt-in consent form and documents to produce		
10/28/16	JMS	Multiple correspondence and telephone conferences to opt-ins regarding litigation and status update		
10/28/16	JMS	Review discovery responses from Kimberly Burchett; Correspondence to Kimberly Burchett regarding the same		
11/01/16	EFP	Finalize Burchett discovery responses; Revise correspondence to opt-ins regarding discovery requests; Correspondence to op-ins regarding discovery requests; Correspondence to opposing counsel regarding Burchett discovery responses		
11/01/16	EFP	Revise correspondence to opt-ins regarding discovery requests		
11/01/16	EFP	Correspondence to op-ins regarding discovery requests		
11/01/16	EFP	Correspondence to opposing counsel regarding Burchett discovery responses		
11/01/16	JMS	Revise correspondence to second set of opt-ins		
11/01/16	JMS	Revise discovery responses of Opt-In Kimberly Burchett		
11/01/16	JMS	Telephone conference with opposing counsel regarding deposition of Buck Moffett; Conference with Peter A. Saba regarding the same		
11/01/16	PAS	Review and revise discovery letter to opt-ins		
11/01/16	PAS	Conference with Josh M. Smith regarding revisions to website and dates for on-site visit		
11/02/16	EFP	Receipt and review of word versions of discovery requests from opposing counsel		
11/02/16	EFP	Email to Rondalyn West regarding discovery requests		
11/02/16	EFP	Email to Sebastien Hue regarding signed contract for website development		
11/02/16	JMS	Correspondence to Peter A. Saba regarding request for inspection		

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11/03/16	PAS	Receipt and review of correspondence from opposing counsel		
11/04/16	JMS	Conference with Dominic Martin		
11/07/16	EFP	Receipt and review of draft discovery responses from Jessica Conroy		
11/07/16	EFP	Receipt and review of signed consent form from Lawanna Haskins		
11/07/16	EFP	Update notice log		
11/07/16	JMS	Receipt and review of correspondence from Sebastien Hue regarding website		
11/07/16	JMS	Draft website provisions for Peter A. Saba review; Correspondence to Peter A. Saba and Sebastien Hue regarding the same		
11/07/16	JMS	Telephone calls to multiple opt-ins regarding discovery requests and opt-in closing period (calls to 12 individuals)		
11/07/16	JMS	Review documents produced by Dominic Martin		
11/08/16	EFP	Review draft discovery responses and documents from Alexandra Cooper		
11/08/16	JMS	Draft litigation strategy memo		
11/08/16	JMS	Draft multiple memos to file regarding calls to Jalen Johnson, Lawanna Haskins, and all other opt-in plaintiffs		
11/08/16	JMS	Correspondence to Sebastien Hue regarding website and draft provisions		
11/08/16	JMS	Conference with Peter A. Saba regarding opt-ins and status updates on the same		
11/08/16	JMS	Telephone conference with Amanda Gayhart regarding status update		
11/09/16	JMS	Correspondence to opposing counsel regarding confirmation of deposition dates		
11/09/16	JMS	Telephone conference with Lawanna Haskins; Draft memo to file regarding the same; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
11/09/16	JMS	Review and revise discovery responses of opt-ins Jessica Conroy and Alexandra Cooper		
11/10/16	EFP	Review filed and unfiled notices; Revise notice log		
11/10/16	EFP	Revise and finalize Bradley discovery responses		

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11/10/16	EFP	Draft and revise notice of filing consent forms		
11/10/16	EFP	File notice of filing and consent forms		
11/10/16	EFP	Email to the client regarding notice of filing and consent forms		
11/10/16	EFP	Correspondence to opposing counsel regarding Bradley discovery responses		
11/10/16	JMS	Receipt and review of discovery responses from opt-in plaintiff Matt Taske		
11/10/16	JMS	Correspondence to Emma F. Paxton regarding opt-in consent forms		
11/10/16	JMS	Correspondence to Madeline Hickey regarding deposition		
11/10/16	JMS	Telephone conference with Sara Elkins-Schumann regarding discovery responses; Correspondence to Sara Elkins-Schumann regarding the same		
11/10/16	JMS	Attempt telephone conference with Ckris Matibiri; Correspondence to Ckris Matibiri regarding discovery requests		
11/10/16	JMS	Attempt telephone conference with Christian Bradley; Correspondence to Christian Bradley regarding discovery requests		
11/10/16	JMS	Telephone conference with opposing counsel		
11/10/16	JMS	Telephone conference with Peter A. Saba regarding depositions		
11/10/16	JMS	Telephone conference with the client regarding status update		
11/10/16	JMS	Revise discovery responses of Christian Bradley		
11/10/16	PAS	Conference with Josh M. Smith regarding additional opt ins; Receipt and review of correspondence from opposing counsel x2; Review correspondence from opt in		
11/11/16	EFP	Review deadlines for discovery responses		
11/11/16	EFP	Review deposition notices		
11/11/16	EFP	Emails to Madeline Hickey and Derek Chipman regarding deposition notices		
11/11/16	JMS	Receipt and review of correspondence from Christian Bradley		
11/11/16	JMS	Correspondence to Sharon J. Sobers regarding deposition scheduling issues		

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11/11/16	JMS	Receipt and review of correspondence from Kelly Rutledge (potential opt-in); Correspondence to Kelly Rutledge regarding the same		
11/11/16	PAS	Conference with Jeffrey M. Nye regarding issues with discovery and depositions		
11/12/16	JMS	Draft deficiency letter to opposing counsel regarding discovery responses		
11/14/16	EFP	Draft and revise notice of filing consents and file notice of filing		
11/14/16	JMS	Prepare for and attend status conference with opposing counsel regarding discovery plan		
11/14/16	JMS	Correspondence to Emma F. Paxton regarding opt-in consent form		
11/14/16	JMS	Correspondence to the client (Joseph Hardesty) regarding deposition		
11/14/16	PAS	Conference with Josh M. Smith regarding issues for discovery conference and discovery needed		
11/14/16	PAS	Conference call with opposing counsel regarding discovery issues and scheduling		
11/14/16	PAS	Receipt and review of correspondence from the Court		
11/14/16	PAS	Receipt and review of correspondence from opposing counsel		
11/15/16	EFP	Revise and finalize deficiency letter and email to opposing counsel regarding deficiency letter		
11/15/16	JMS	Revise deficiency letter; Conference with Peter A. Saba regarding the same		
11/15/16	PAS	Review and revise discovery letter to opposing counsel		
11/16/16	EFP	Draft and revise notice of filing consents, file notice of filing		
11/16/16	JMS	Draft third set of discovery requests to defendant		
11/16/16	JMS	Correspondence with Sara Rainey regarding responses to discovery requests		
11/16/16	JMS	Telephone conference with the client regarding status update and request for inspection		
11/17/16	EFP	Finalize Elkins-Schumann discovery responses and correspondence to opposing counsel regarding discovery responses, email to opposing counsel regarding discovery responses		

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11/17/16	JMS	Telephone conference with Sara Elkins-Schumann		
11/17/16	JMS	Revise discovery responses of Sara Elkins-Schumann		
11/17/16	JMS	Correspondence with Sharon J. Sobers regarding FLSA and injunction decision on overtime regulations		
11/17/16	JMS	Revise motion for 23(b) certification		
11/17/16	PAS	Receipt and review of correspondence from the Court		
11/18/16	EFP	Review Rondalyn West's draft discovery responses		
11/18/16	EFP	Telephone conference with court reporter regarding Victoriano deposition transcript		
11/18/16	JMS	Telephone conference with Sharon J. Sobers regarding request for inspection		
11/18/16	JMS	Receipt and review of correspondence from opposing counsel regarding discovery deficiencies		
11/18/16	PAS	Receipt and review of correspondence from opposing counsel		
11/21/16	JMS	Revise discovery responses of Rondalyn West		
11/21/16	JMS	Telephone conference with the client regarding status update		
11/21/16	JMS	Review photographs taken from Inspection of CoRE Premises; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same; Telephone conference with Peter A. Saba regarding the same		
11/22/16	EFP	Review new discovery deadlines		
11/22/16	EFP	Draft and revise notice of filing consents. file notice of filing		
11/22/16	JMS	Receipt and review of Court Ordered injunction of Department of Labor regulations; Correspondence to Peter A. Saba regarding the same		
11/22/16	JMS	Telephone conference with opposing counsel regarding deposition dates; Draft memo to file regarding the same		
11/23/16	JMS	Correspondence to Sebastien Hue regarding website		
11/23/16	JMS	Draft deposition guideline		
11/23/16	JMS	Correspondence to Madeline Hickey regarding deposition		
11/23/16	JMS	Legal research in preparation for Madeline Hickey deposition		

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11/23/16	PAS	Receipt and review of correspondence from the Court; Receipt and review of correspondence from opposing counsel x2		
11/26/16	JMS	Prepare for deposition of Madeline Hickey; Legal research regarding FLSA claims and defenses in preparation for deposition		
11/27/16	JMS	Telephone conference with the client regarding status update		
11/27/16	JMS	Review file and documents in preparation for Madeline Hickey deposition		
11/28/16	EFP	Review issues with documents produced by defendant		
11/28/16	JMS	Prepare for Madeline Hickey deposition		
11/28/16	JMS	Legal research regarding damages estimates and sufficiency of testimony		
11/28/16	JMS	Telephone conference with the client and Peter A. Saba regarding deposition		
11/28/16	JMS	Correspondence with opposing counsel regarding deposition scheduling		
11/28/16	JMS	Correspondence to Dominic Martin regarding follow-up documents and audio recordings of Daniele Williams		
11/28/16	JMS	Correspondence to Peter A. Saba regarding website		
11/28/16	JMS	Review draft website format; Correspondence to Sebastien Hue regarding the same		
11/28/16	PAS	Conference with Josh M. Smith regarding issues with depositions		
11/28/16	PAS	Receipt and review of scheduling documents from opposing counsel		
11/28/16	PAS	Conference call with Madeline Hickey regarding deposition preparation		
11/29/16	EFP	Review documents produced by opposing counsel		
11/29/16	JMS	Prepare for Madeline Hickey deposition; Conference with client regarding deposition preparation		
11/30/16	EFP	Review notice of Joseph Hardesty's deposition, email to the client regarding deposition notice		
11/30/16	JMS	Attend deposition of Madeline Hickey		

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11/30/16	PAS	Receipt and review of correspondence from opposing counsel regarding depositions; Conference with Josh M. Smith regarding issues with deposition of Madeline Hickey		
12/01/16	EFP	Telephone conference with court reporter regarding deposition, review deposition exhibits and conference with Peter A. Saba and Josh M. Smith regarding deposition of Rana Schiff		
12/01/16	JMS	Edit and revise 30(b)(6) deposition notice; Correspondence to Peter A. Saba regarding the same		
12/01/16	JMS	Correspondence to Emma F. Paxton regarding deposition transcript		
12/01/16	PAS	Conference with Josh M. Smith regarding issues with 30(b)(6) deposition; Receipt and review of correspondence from opposing counsel		
12/02/16	EFP	Finalize deposition notice and correspondence to opposing counsel regarding deposition notice, email to opposing counsel		
12/02/16	JMS	Edit and revise notice of 30(b)(6) deposition		
12/02/16	JMS	Telephone conference with Joe Hardesty regarding status update		
12/02/16	JMS	Correspondence to the client regarding deposition preparation; Telephone conference with the client x2 regarding the same		
12/02/16	PAS	Review and revise 30(b)(6) notice		
12/05/16	JMS	Review of Madeline Hickey deposition transcript; Conference with Peter A. Saba regarding the same; Correspondence to Madeline Hickey regarding the same		
12/05/16	JMS	Correspondence to Peter A. Saba regarding Rana Schiff deposition		
12/05/16	SJS	Review Hickey deposition		
12/06/16	JMS	Receipt and review of correspondence from opposing counsel regarding discovery deficiencies		
12/06/16	JMS	Preparation for deposition of Rana Schiff		
12/07/16	JMS	Review of deficiency letter in preparation for telephone conference with opposing counsel; Draft notes regarding the same; Telephone conference with Peter A. Saba regarding the same		
12/07/16	JMS	Receipt and review of documentation from the Court regarding agreed order and filing error		

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12/07/16	JMS	Correspondence with opposing counsel regarding discovery deficiency letter and telephone conference regarding the same		
12/07/16	JMS	Correspondence to Peter A. Saba regarding motion to certify and legal research regarding the same		
12/07/16	PAS	Receipt and review of correspondence from opposing counsel		
12/07/16	PAS	Receipt and review of correspondence from the Court		
12/07/16	PAS	Review and revise discovery deficiency letters and issues with discovery		
12/08/16	JMS	Prepare for telephone conference with opposing counsel regarding discovery deficiencies; Telephone conference with opposing counsel regarding the same; Draft notes regarding discussion with opposing counsel; Correspondence to Derek Chipman regarding deposition preparation		
12/08/16	PAS	Conference call with opposing counsel regarding review of discovery issues		
12/09/16	JMS	Telephone conference with the Court regarding corrected agreed order; Correspondence to the Court regarding the same		
12/09/16	JMS	Revise notes regarding discovery deficiency conference with opposing counsel		
12/09/16	JMS	Prepare for Rana Schiff deposition; Correspondence to Peter A. Saba regarding the same		
12/09/16	PAS	Receipt and review of correspondence from the Court x2		
12/10/16	JMS	Prepare for Rana Schiff deposition		
12/11/16	JMS	Prepare for Derek Chipman deposition		
12/12/16	EFP	Telephone conference and emails with court reporter, review emails and documents from Jeremy Hadden, review corrected agreed order		
12/12/16	JMS	Correspondence with multiple opt-ins (Alexandra Cooper, Jessica Conroy, Matt Taske, Jeremy Hadden, Dominic Martin; Rondalyn West) regarding discovery responses; Revise discovery responses for multiple opt-ins		
12/12/16	JMS	Receipt and review of correspondence from Sebastien Hue regarding website; Correspondence to Peter A. Saba regarding the same		
12/12/16	JMS	Prepare for Rana Schiff deposition		

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12/12/16	JMS	Correspondence with Amanda Gayhart regarding status update		
12/12/16	JMS	Draft correspondence to opposing counsel regarding confirmation of discovery deficiency telephone conference discussion		
12/12/16	JMS	Correspondence to Peter A. Saba and Emma F. Paxton regarding opt-in discovery responses		
12/12/16	PAS	Review case law for Rana Schiff deposition		
12/13/16	EFP	Draft and revise correspondence to opt-ins regarding discovery requests		
12/13/16	EFP	Review deadline for discovery responses		
12/13/16	EFP	Email to opposing counsel regarding discovery requests		
12/13/16	EFP	Finalize correspondence to opposing counsel regarding discovery deficiencies		
12/13/16	EFP	Email to opposing counsel		
12/13/16	EFP	Revise and finalize discovery responses for West and Conroy		
12/13/16	EFP	Prepare documents for production to opposing counsel		
12/13/16	EFP	Receipt and review of word versions of discovery from opposing counsel		
12/13/16	EFP	Correspondence to opposing counsel regarding discovery responses		
12/13/16	JMS	Correspondence to opposing counsel regarding discovery requests and extension; Telephone conference with opposing counsel regarding the same		
12/13/16	JMS	Revise multiple discovery responses of opt-in plaintiffs; Correspondence with Emma F. Paxton regarding the same; Correspondence to Peter A. Saba regarding the same		
12/13/16	JMS	Prepare for Rana Schiff deposition		
12/13/16	PAS	Conference with Josh M. Smith regarding additional issues for depositions		
12/14/16	EFP	Finalize correspondence to third set of opt-ins regarding discovery requests		
12/14/16	EFP	Finalize Hadden discovery responses		
12/14/16	EFP	Prepare documents for production		

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12/14/16	EFP	Correspondence to opposing counsel regarding discovery responses		
12/14/16	EFP	Receipt and review of correspondence from the Court x2		
12/14/16	JMS	Prepare for Rana Schiff deposition; Telephone conference with the client regarding the same		
12/14/16	JMS	Correspondence to Derek Chipman regarding deposition		
12/14/16	JMS	Review discovery responses of Jeremy Hadden		
12/14/16	PAS	Receipt and review of correspondence from the Court		
12/14/16	SJS	Draft memo to Joshua M. Smith responding to his memo to Peter A. Saba on preparation for Schiff deposition		
12/14/16	SJS	Review Hickey deposition transcript		
12/15/16	EFP	Emails with court reporter regarding confirmation of deposition		
12/15/16	EFP	Review potential deposition exhibits		
12/15/16	EFP	Review and log documents produced by opposing counsel		
12/15/16	EFP	Prepare exhibits for deposition of Rana Schiff		
12/15/16	JMS	Prepare for Rana Schiff deposition		
12/16/16	EFP	Prepare exhibits for Rana Schiff deposition		
12/16/16	EFP	Revise and finalize Cooper and Martin discovery responses		
12/16/16	EFP	Prepare documents for production to opposing counsel		
12/16/16	EFP	Correspondence to opposing counsel regarding discovery responses		
12/16/16	JMS	Correspondence with opt-ins Alexandra Cooper and Dominic Martin regarding discovery responses; Revise the same		
12/16/16	JMS	Correspondence with Sharon J. Sobers regarding Madeline Hickey deposition		
12/16/16	JMS	Correspondence with Sharon J. Sobers regarding Rana Schiff deposition		
12/17/16	JMS	Prepare for Rana Schiff deposition		
12/17/16	PAS	Outline issues for Rana Schiff deposition		
12/18/16	JMS	Consultation with Derek Chipman and Joseph Hardesty regarding deposition preparation		

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Date	Int	Professional Services	Hours	Amount
12/18/16	JMS	Legal research regarding 30(b)(6) depositions and second notice of deposition		
12/18/16	JMS	Legal research regarding primary duty with respect to administrative exemption		
12/18/16	JMS	Multiple telephone conferences with Peter A. Saba regarding Rana Schiff deposition and relevant documents		
12/18/16	PAS	Review all exhibits for deposition; Draft outline of all issues for Rana Schiff deposition		
12/19/16	EFP	Prepare exhibits for Rana Schiff deposition		
12/19/16	JMS	Prepare for and attend Rana Schiff deposition		
12/19/16	JMS	Telephone conference with the client regarding status update		
12/19/16	PAS	Prepare for and attend deposition of Rana Schiff		
12/20/16	EFP	Review deposition exhibits		
12/20/16	JMS	Consultation with Derek Chipman regarding deposition preparation		
12/20/16	JMS	Receipt and review of documents from opposing counsel; Telephone conference with Peter A. Saba regarding the same; Telephone conference with Sharon J. Sobers regarding the same		
12/20/16	SJS	Telephone conference with Joshua Smith regarding the client calling CoRE line at Kroger and related issues		
12/21/16	EFP	Telephone conference with court reporter regarding Rana Schiff's deposition		
12/21/16	JMS	Prepare for and attend deposition of Joseph Hardesty (2/2)		
12/21/16	JMS	Telephone conference with Derek Chipman regarding deposition preparation		
12/21/16	JMS	Receipt and review of correspondence from opposing counsel regarding discovery deficiencies		
12/21/16	PAS	Conference with Josh M. Smith regarding issues with Hardesty deposition		
12/22/16	JMS	Prepare for and attend deposition of Derek Chipman		

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12/23/16	JMS	Telephone conference with opposing counsel regarding deposition and discovery issues; Correspondence to Sharon J. Sobers and Peter A. Saba regarding the same		
12/23/16	JMS	Correspondence to Ckris Matibiri regarding delinquent discovery responses		
12/27/16	JMS	Correspondence with Madeline Hickey regarding deposition review		
12/27/16	JMS	Revise motion for 23(b) certification		
12/28/16	EFP	Review Chipman deposition exhibits		
12/28/16	JMS	Receipt and review of discovery responses from Corbin Hom		
12/29/16	EFP	Review Hardesty deposition exhibits		
12/29/16	JMS	Draft and revise motion for rule 23(b) certification		
1/03/17	EFP	Receipt and review of signed consent form from Marcus LaCour		
1/03/17	EFP	Receipt and review of draft discovery responses and documents from Kelly Rutledge		
1/03/17	EFP	Receipt and review of transcript of Rana Schiff deposition		
1/03/17	EFP	Draft and revise notice of filing consents		
1/03/17	EFP	File notice of filing		
1/03/17	PAS	Receipt and review of correspondence from opposing counsel		
1/04/17	JMS	Draft correspondence to opposing counsel regarding discovery issues; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
1/04/17	JMS	Correspondence to opposing counsel regarding follow-up on deficiency letter and documents to produce		
1/04/17	JMS	Telephone conference with Madeline Hickey regarding deposition transcript		
1/04/17	JMS	Telephone conference with Derek Chipman regarding law school applications		
1/04/17	JMS	Receipt and review of correspondence from Derek Chipman regarding the same		

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1/04/17	JMS	Telephone conference with the client regarding deposition of Daniele Williams		
1/04/17	JMS	Correspondence to Peter A. Saba regarding deposition transcript		
1/04/17	JMS	Correspondence to Emma F. Paxton regarding Ckris Matibiri discovery responses		
1/04/17	JMS	Correspondence to Sebastien Hue regarding website		
1/04/17	PAS	Receipt and review of correspondence from court reporter		
1/05/17	EFP	Emails with court reporter regarding Chipman deposition transcript and review same		
1/05/17	JMS	Receipt and review of Rana Schiff deposition transcript		
1/05/17	JMS	Correspondence with Sebastien Hue regarding website		
1/05/17	JMS	Receipt and review of Derek Chipman deposition transcript		
1/06/17	EFP	Review and redact documents from Derek Chipman		
1/06/17	JMS	Review documents produced by Derek Chipman (law school transcripts); Correspondence with Emma F. Paxton and Peter A. Saba regarding the same		
1/06/17	JMS	Correspondence with opposing counsel regarding discovery issues		
1/07/17	JMS	Receipt and review of news article regarding Kroger and overtime rules		
1/09/17	PAS	Receipt and review of correspondence from opposing counsel regarding discovery requests		
1/10/17	PAS	Conference with Josh M. Smith regarding issues with Buck Moffett deposition		
1/10/17	SJS	Read Rana Schiff deposition		
1/12/17	EFP	Draft and revise notice of deposition of Daniele Williams, correspondence to opposing counsel regarding notice of deposition and email to the client regarding notice of deposition		
1/12/17	JMS	Review notice of deposition for Daniele Williams; Revise the same		
1/12/17	JMS	Telephone conference with opposing counsel		
1/12/17	JMS	Correspondence with Sharon J. Sobers regarding depositions		
1/12/17	JMS	Draft motion for Rule 23(b) certification		

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Date	Int	Professional Services	Hours	Amount
1/12/17	JMS	Review deposition of Rana Schiff		
1/12/17	SJS	Respond to email from Joshua M. Smith regarding difficulty getting Buck Moffett deposition scheduled; Respond to emails from Joshua M. Smith regarding depositions		
1/13/17	EFP	Emails with court reporter regarding confirmation of deposition and condense deposition transcripts		
1/13/17	JMS	Draft and revise Rule 23(b) motion for certification		
1/13/17	JMS	Receipt and review of Diana Victoriano deposition transcript		
1/13/17	JMS	Review various deposition transcripts in preparation for drafting Rule 23(b) motion for certification		
1/13/17	SJS	Telephone conference with Joshua M. Smith regarding Moffett deposition and need to change scheduling order		
1/14/17	SJS	Review Rana Schiff deposition		
1/16/17	EFP	Telephone conference with Ckris Matibiri regarding discovery responses and conference with Josh M. Smith regarding issues with Matibiri discovery responses		
1/16/17	SJS	Review Rana Schiff deposition		
1/17/17	EFP	Conference with Josh M. Smith regarding issues with service of discovery responses on opt-ins		
1/17/17	EFP	Receipt and review of document production from opposing counsel		
1/17/17	JMS	Receipt and review of documents produced by Kroger; Telephone conference with the client regarding the same		
1/17/17	PAS	Conference with Josh M. Smith regarding issues with Moffett deposition		
1/17/17	SJS	Review Rana Schiff deposition; Draft memo regarding deposition for Joshua M. Smith		
1/18/17	JMS	Legal research regarding rule 23(b) certification		
1/19/17	JMS	Revise discovery responses of opt-in plaintiffs		
1/19/17	JMS	Telephone conference with the client		
1/19/17	JMS	Telephone conference with opposing counsel regarding deposition of Buck Moffett and related discovery issues; Conference with Peter A. Saba regarding the same		

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Date	Int	Professional Services	Hours	Amount
1/19/17	JMS	Correspondence with Peggy Gruenke and Sebastien Hue regarding website		
1/20/17	JMS	Revise multiple opt-in discovery responses		
1/20/17	JMS	Correspondence with multiple op-ins regarding discovery responses		
1/20/17	JMS	Telephone conference with opposing counsel regarding discovery responses		
1/20/17	JMS	Correspondence to opposing counsel regarding the same		
1/23/17	EFP	Review documents produced by opposing counsel and prepare documents for production		
1/23/17	JMS	Telephone conference with opposing counsel regarding deposition and court deadlines; Receipt and review of correspondence from opposing counsel regarding the same; Conference with Peter A. Saba regarding the same		
1/23/17	JMS	Review documents produced		
1/23/17	JMS	Receipt and review of correspondence from opt-in plaintiff Jalen Johnson; Correspondence with the client regarding the same		
1/23/17	JMS	Review and prepare Chipman documents (law school transcripts) for production		
1/23/17	JMS	Conference with Sebastien Hue and Peggy Gruenke regarding website		
1/23/17	SJS	Conference with Joshua M. Smith x2 regarding wage payment for current opt-in employees for time spent in depositions (whether Defendant can pick opt-ins to depose and then force them to forgo wages, vacation time for time spent in depositions)		
1/24/17	EFP	Review dates for depositions of opt-ins		
1/24/17	EFP	Draft and revise notice of deposition of Buck Moffett		
1/24/17	JMS	Multiple correspondence and communication with opt-in plaintiffs regarding depositions; Telephone conference with opposing counsel regarding the same		
1/24/17	JMS	Prepare for Daniele Williams deposition		

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1/24/17	JMS	Telephone conference with Sharon J. Sobers regarding opt-in depositions and payment of wages; Telephone conference with Deborah Grayson regarding the same; Correspondence with Sharon J. Sobers regarding the same		
1/24/17	JMS	Legal research regarding opt-in depositions and expenses		
1/24/17	JMS	Correspondence with Sebastien Hue regarding website		
1/25/17	EFP	Correspondence to opposing counsel regarding document production and preparation of the same, conference with Joshua M. Smith regarding issues with production		
1/25/17	EFP	Finalize discovery responses of opt-in plaintiffs and correspondence to opposing counsel regarding discovery responses of opt-in plaintiffs, prepare documents for production to opposing counsel		
1/25/17	JMS	Correspondence with opposing counsel regarding attorney-client privileged documents; Telephone conference with Sharon J. Sobers and Peter A. Saba regarding the same; Legal research regarding the same		
1/25/17	JMS	Correspondence with opt-in plaintiffs regarding discovery responses; Revise the same		
1/25/17	PAS	Conference with Joshua M. Smith regarding issues with document production; Receipt and review of correspondence from opposing counsel regarding issues regarding statements against interest		
1/25/17	SJS	Review email from Joshua M. Smith regarding production of communication arguably covered by attorney-client privilege to opt-in and subsequently to attorney; Email to Joshua M. Smith regarding the same; Telephone conference with Joshua M. Smith regarding the same		
1/26/17	JMS	Receipt and review of correspondence from opposing counsel regarding agreed motion to extend; Revise the same; Correspondence to Peter A. Saba regarding the same		
1/26/17	JMS	Prepare opt-in discovery responses for Corbin Hom		
1/27/17	EFP	Finalize opt-in discovery responses		
1/27/17	EFP	Review deadline for discovery responses; Receipt and review of correspondence from the Court regarding motion to extend Rule 23 deadlines		
1/27/17	EFP	Review new Rule 23 deadlines		

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Date	Int	Professional Services	Hours	Amount
1/27/17	EFP	Prepare documents for production		
1/27/17	EFP	Correspondence to opposing counsel regarding discovery responses		
1/27/17	JMS	Prepare for deposition of Daniele Williams		
1/27/17	JMS	Correspondence with opposing counsel regarding proposed revisions to agreed motion to extend; Receipt and review of correspondence regarding the same		
1/27/17	JMS	Finalize opt-in plaintiff discovery responses		
1/27/17	JMS	Receipt and review of correspondence from Kelly Rutledge regarding management meeting and exempt status of CoRE Recruiters		
1/27/17	JMS	Receipt and review of Derek Chipman corrections to deposition testimony transcript		
1/28/17	JMS	Prepare for Daniele Williams deposition		
1/30/17	PAS	Receipt and review of correspondence from the Court		
1/31/17	JMS	Attend deposition of Daniele Williams		
2/01/17	EFP	Telephone conference with court reporter regarding transcript of depositions		
2/01/17	JMS	Correspondence with Peter A. Saba and Peggy Gruenke regarding website updates and revisions		
2/01/17	JMS	Telephone conference with Peter A. Saba regarding deposition of Daniele Williams; Correspondence with Sharon J. Sobers regarding the same		
2/01/17	JMS	Telephone conference with the client regarding status update		
2/01/17	JMS	Draft motion for rule 23(b) certification		
2/01/17	PAS	Conference with Joshua M. Smith regarding issues with deposition; Receipt and review of correspondence from Matt Taske		
2/02/17	EFP	Draft and revise Chipman errata sheet and email to Derek Chipman regarding same, review deposition notices and discovery requests from opposing counsel		
2/02/17	JMS	Telephone conference with opposing counsel regarding deposition scheduling; Conference with Peter A. Saba regarding the same		

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Date	Int	Professional Services	Hours	Amount
2/02/17	JMS	Conference with Peter A. Saba regarding security badge logs and recruiter work schedules		
2/02/17	JMS	Receipt and review of correspondence from Kim Burchett regarding deposition		
2/02/17	JMS	Receipt and review of notices of deposition from opposing counsel		
2/02/17	JMS	Correspondence with Emma F. Paxton regarding corrections to Derek Chipman deposition testimony		
2/02/17	JMS	Correspondence with opposing counsel regarding confirmation of deposition date for Daniele Williams		
2/02/17	JMS	Draft Motion for Rule 23(b) certification		
2/02/17	JMS	Correspondence with opt-in Corbin Hom regarding deposition		
2/02/17	JMS	Correspondence to Kelly Rutledge regarding deposition scheduling		
2/02/17	JMS	Telephone conference with Peggy Gruenke regarding website		
2/02/17	PAS	Receipt and review of correspondence from opposing counsel regarding discovery		
2/02/17	PAS	Conference with Joshua M. Smith regarding punch card information		
2/03/17	JMS	Review phone call logs produced by defendant		
2/03/17	JMS	Correspondence to Emma F. Paxton regarding review of call logs and determination of overtime hours		
2/03/17	JMS	Revise provisions to class action website; Correspondence to Peter A. Saba and Peggy Gruenke regarding the same; Telephone conference with Peggy Gruenke regarding the same		
2/03/17	JMS	Correspondence to Emma F. Paxton regarding opt-in discovery (Ward and Moore)		
2/03/17	JMS	Telephone conference with Jacob Cress regarding discovery responses; Correspondence to Jacob Cress regarding the same		
2/03/17	JMS	Attempt telephone conference x4 with opt-in plaintiffs regarding discovery responses		
2/03/17	JMS	Revise rule 23(b) motion for certification		
2/04/17	JMS	Revise rule 23(b) motion for certification		

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Date	Int	Professional Services	Hours	Amount
2/07/17	EFP	Conference with Peter A. Saba regarding outstanding discovery issues and preparation for status conference; Attend status conference; Prepare for telephone status conference; Review of draft correspondence to be sent to opposing counsel regarding depositions; Correspondence with Corbin Hom regarding deposition; Attempt telephone conference with Corbin Hom regarding the same		
2/07/17	EFP	Draft and revise correspondence to opt-ins regarding discovery requests		
2/07/17	EFP	Email to opt-ins regarding deposition notices		
2/07/17	EFP	Review minute entry regarding status conference		
2/07/17	EFP	Finalize notice of deposition of Buck Moffett		
2/07/17	EFP	Correspondence to opposing counsel regarding Buck Moffett deposition notice		
2/07/17	EFP	Draft and revise notice of deposition of Daniele Williams		
2/07/17	EFP	Emails with court reporter regarding deposition notices		
2/07/17	JMS	Conference with Peter A. Saba regarding outstanding discovery issues and preparation for status conference; Attend status conference; Prepare for telephone status conference		
2/07/17	JMS	Receipt and review of multiple draft correspondence to opposing counsel regarding depositions		
2/07/17	JMS	Correspondence with Corbin Hom regarding deposition		
2/07/17	JMS	Attempt telephone conference with Corbin Hom regarding the same		
2/07/17	PAS	Conference with Joshua M. Smith regarding issues with case; Attend status conference with the Court		
2/08/17	EFP	Email from opt-in regarding issues with notice		
2/08/17	JMS	Conference with Peter A. Saba regarding website; Correspondence to Peggy Gruenke regarding the same		
2/08/17	JMS	Conference with Sharon J. Sobers regarding litigation strategy		
2/08/17	JMS	Correspondence to opt-in Corbin Hom regarding deposition		
2/08/17	PAS	Review and revise notices in website		
2/09/17	EFP	Draft and revise attorney's fees summaries		

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2/09/17	JMS	Correspondence with Corbin Hom regarding deposition; Correspondence with opposing counsel regarding the same		
2/09/17	JMS	Prepare for deposition of Brianna Whitlow		
2/09/17	JMS	Telephone conference with opposing counsel regarding depositions		
2/09/17	JMS	Telephone conference with opposing counsel regarding opt-in discovery responses and extensions to the same		
2/09/17	JMS	Conference with Peter A. Saba regarding deposition		
2/09/17	JMS	Correspondence to Emma F. Paxton regarding attorney fees		
2/09/17	PAS	Conference with Joshua M. Smith regarding review and preparation for deposition of Briana Whitlow		
2/09/17	PAS	Review and revise attorney fees summaries		
2/10/17	EFP	Review aux data spreadsheets produced by defendants; Draft and revise spreadsheets of hours worked and percent of time recruiting; Finalize Hom discovery responses; Correspondence to opposing counsel regarding Hom discovery responses		
2/10/17	JMS	Prepare for and attend deposition of Brianna Whitlow		
2/11/17	JMS	Review Daniele Williams deposition transcript		
2/11/17	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding notes from Whitlow deposition		
2/13/17	EFP	Email to Corbin Hom regarding notice of deposition		
2/13/17	EFP	Revise spreadsheet of recruiting time by date		
2/13/17	JMS	Correspondence with Amanda Gayhart regarding status update		
2/14/17	EFP	Draft spreadsheet of overtime worked per week		
2/14/17	JMS	Multiple correspondence with opt-in plaintiffs regarding discovery responses; Telephone conference with Marcus LaCour regarding the same		
2/14/17	JMS	Draft discovery responses with respect to multiple opt-in plaintiffs		
2/14/17	JMS	Review Daniele Williams deposition transcript		
2/15/17	JMS	Correspondence to opt-in Matt Taske regarding deposition		

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Date	Int	Professional Services	Hours	Amount
2/15/17	JMS	Telephone conference with Marcus Lacour regarding discovery responses and litigation status update		
2/15/17	JMS	Review Daniele Williams deposition transcript		
2/16/17	EFP	Revise recruiting time spreadsheet by recruiter name		
2/16/17	JMS	Telephone conference with opposing counsel regarding Chipman law school applications and stipulation to authenticity; Correspondence with opposing counsel regarding the same		
2/16/17	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding correspondence from third party administrators		
2/16/17	JMS	Receipt and review of correspondence from opt-in Matt Taske regarding deposition prep		
2/16/17	JMS	Receipt and review of correspondence from opposing counsel regarding Chris Weiler deposition		
2/16/17	PAS	Receipt and review of correspondence from opposing counsel; Receipt and review of correspondence from TPA		
2/17/17	EFP	Revise recruiting time spreadsheet by recruiter name		
2/17/17	JMS	Prepare for meeting with Kimberly Burchett regarding deposition prep		
2/17/17	JMS	Attend deposition prep with Kimberly Burchett		
2/17/17	JMS	Multiple correspondence with opt-ins regarding discovery responses and deposition preparation		
2/17/17	JMS	Correspondence with Peggy Gruenke regarding class action website		
2/18/17	JMS	Draft and revise motion for rule 23(b) certification		
2/20/17	EFP	Revise and finalize Marcus LaCour discovery responses		
2/20/17	EFP	Revise and finalize Jacob Cress discovery responses		
2/20/17	EFP	Correspondence to opposing counsel regarding discovery responses		
2/20/17	JMS	Correspondence to Emma F. Paxton regarding opt-in discovery responses of Marcus LaCour		
2/20/17	JMS	Correspondence to Jacob Cress regarding opt-in discovery responses		
2/20/17	JMS	Finalize objections to discovery responses of opt-ins		

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2/20/17	JMS	Correspondence to opposing counsel regarding extension of time for opt-in discovery responses		
2/20/17	JMS	Receipt and review of draft website newsletter from Peggy Gruenke; Correspondence to Peggy Gruenke regarding the same		
2/20/17	PAS	Conference with Joshua M. Smith regarding issues with manager deposition		
2/21/17	EFP	Review class website		
2/21/17	EFP	Emails with court reporter regarding Buck Moffett deposition		
2/21/17	JMS	Conference with Peter A. Saba regarding settlement and mediation; Telephone conference with the client regarding the same		
2/21/17	JMS	Telephone conference with Sharon J. Sobers regarding the same; Legal research regarding settlement of FLSA hybrid class actions		
2/21/17	PAS	Conference with Joshua M. Smith regarding issues with potential mediation of FLSA claims and scheduling for discovery		
2/21/17	SJS	Telephone conference with Joshua M. Smith regarding mediation		
2/22/17	EFP	Telephone conference with court reporter to cancel depositions		
2/22/17	JMS	Telephone conference with opposing counsel regarding upcoming depositions and mediation; Draft correspondence to opposing counsel regarding the same; Conference with Peter A. Saba and Sharon J. Sobers regarding the same		
2/22/17	JMS	Legal research regarding class and collective action settlement; Correspondence to Sharon J. Sobers regarding the same		
2/22/17	JMS	Telephone conference with Peggy Gruenke regarding website and newsletter		
2/22/17	JMS	Correspondence with Debbie Grayson regarding wage and hour mediator suggestions		
2/22/17	JMS	Research mediators specializing in wage and hour claims; Correspondence to Peter A. Saba regarding the same		
2/22/17	JMS	Telephone conference with multiple opt-ins regarding cancellation and postponement of depositions		
2/22/17	PAS	Conference with Joshua M. Smith regarding issues with mediator selection and rescheduling depositions		

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2/22/17	PAS	Review background and qualifications for various mediators		
2/22/17	PAS	Receipt and review of correspondence from opposing counsel		
2/22/17	SJS	Review information regarding potential mediators, Forward information to Joshua M. Smith		
2/22/17	SJS	Review email from Joshua M. Smith regarding failure of employee to opt-in to FLSA class on failure to opt-out of 23(b) class, Email preliminary response to Joshua M. Smith		
2/23/17	EFP	Revise recruiter overtime spreadsheet		
2/23/17	JMS	Legal research regarding settlement of claims and release of FLSA claims		
2/23/17	JMS	Receipt and review of legal research from Sharon J. Sobers regarding settlement of FLSA claims; Correspondence from Sharon J. Sobers regarding the same		
2/23/17	JMS	Review Briana Whitlow deposition transcript		
2/23/17	JMS	Legal research regarding recruiters and administrative exemption		
2/23/17	JMS	Correspondence with Sharon J. Sobers regarding settlement approval research		
2/23/17	SJS	Email to Joshua M. Smith regarding possibility of using magistrate as mediator		
2/23/17	SJS	Legal research regarding effect of employee failure to opt-in to FLSA class on failure to opt-out of 23(b) class, research and review Kritzer case and procedures for settlement, legal research regarding potential for reopening opportunity for FLSA opt-ins during 23(b) settlement		
2/24/17	EFP	Research regarding previous class action settlement and mediator		
2/24/17	JMS	Telephone conference with Peter A. Saba regarding mediation		
2/24/17	JMS	Conference with Peter A. Saba regarding mediators and settlement		
2/24/17	JMS	Receipt and review of additional production of documents by defendant; Conference with Peter A. Saba regarding the same		
2/24/17	PAS	Receipt and review of correspondence from court reporter		
2/24/17	PAS	Review case law regarding settlement terms and settlement issues		
2/24/17	PAS	Conference with Joshua M. Smith regarding potential mediators		

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2/24/17	SJS	Email Monihan settlement documents to Joshua M. Smith		
2/24/17	SJS	Legal research regarding implications of potential res judicata effect of failure to opt-out of 23(b) class, memo to Joshua M. Smith regarding potential res judicata effect of failure to opt-out of 23(b) class		
2/26/17	PAS	Conference with Joshua M. Smith regarding additional issues regarding damages and mediators		
2/26/17	PAS	Review case law regarding damage issues		
2/27/17	JMS	Conference with Peter A. Saba regarding mediators and draft settlement and release language; Legal research regarding the same		
2/27/17	JMS	Telephone conference with opposing counsel regarding mediators		
2/27/17	JMS	Draft spreadsheet of overtime hours for Joseph Hardesty and other opt-ins, related to security badge swipes		
2/27/17	PAS	Conference with Joshua M. Smith regarding issues with administrator expense and review of additional mediator qualifications		
2/27/17	PAS	Review potential settlement terms and settlement motions		
2/27/17	PAS	Receipt and review of correspondence from counsel for Briana Whitlow		
2/27/17	SJS	Telephone conference with Joshua M. Smith regarding selection of mediator; Calculation of overtime for individual class members		
2/28/17	EFP	Conference with Joshua M. Smith regarding spreadsheets		
2/28/17	JMS	Draft damages calculation for sample opt-in Plaintiff Marye Ward; Correspondence to Peter A. Saba regarding the same		
2/28/17	PAS	Review Hardesty and additional employee overtime calculations		
2/28/17	PAS	Conference with Joshua M. Smith regarding calculations of overtime worked by each employee		
2/28/17	PAS	Review correspondence from the Court		
3/01/17	JMS	Telephone conference with opposing counsel x2 regarding mediation dates; Correspondence to opposing counsel x3 regarding the same; Telephone conference with x2 Peter A. Saba regarding the same		
3/01/17	JMS	Prepare damages spreadsheet		
3/01/17	PAS	Conference with Joshua M. Smith regarding mediation dates and issues		

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3/02/17	JMS	Revise damages spreadsheet; Correspondence with Peter A. Saba regarding the same; Conference with Peter A. Saba regarding the same		
3/02/17	JMS	Telephone conference with opposing counsel regarding discovery issues; Correspondence with opposing counsel regarding the same		
3/02/17	JMS	Draft correspondence to opposing counsel regarding discovery deficiencies with respect to recruiter work schedules		
3/02/17	PAS	Conference with Joshua M. Smith regarding damage calculations		
3/02/17	PAS	Detailed review and recalculation of overtime for sample employees		
3/02/17	PAS	Summarize all evidence supporting damage calculations		
3/03/17	JMS	Correspondence with opposing counsel and mediator's office regarding mediation date; Telephone conference with opposing counsel regarding the same; Conference with Peter A. Saba regarding the same; Conference with the client regarding the same		
3/03/17	JMS	Correspondence to opposing counsel regarding discovery deficiencies (team schedules)		
3/03/17	PAS	Receipt and review of correspondence from mediator; Conference with Joshua M. Smith regarding additional mediation dates		
3/06/17	EFP	Review correspondence from mediator regarding issues with mediation		
3/06/17	JMS	Correspondence with opposing counsel regarding joint motions for extension		
3/07/17	JMS	Draft joint motion for extension of calendar order		
3/07/17	PAS	Receipt and review of correspondence from mediator		
3/08/17	EFP	Receipt and review of invoice for deposition transcripts		
3/08/17	EFP	Review attorneys fees summaries		
3/08/17	EFP	Draft and revise correspondence to opposing counsel regarding attorneys fees summaries		
3/08/17	JMS	Draft spreadsheet regarding number of employees in class throughout relevant weekly time periods		
3/08/17	JMS	Revise joint motion to extend calendar order; Correspondence to Peter A. Saba regarding the same		
3/08/17	JMS	Review correspondence to opposing counsel regarding fees expended		

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Date	Int	Professional Services	Hours	Amount
3/09/17	EFP	Finalize correspondence to opposing counsel regarding attorney's fees summaries; Email to opposing counsel regarding attorney's fees summaries		
3/09/17	EFP	Convert badge swipe reports		
3/09/17	JMS	Draft and revise spreadsheet regarding number of class members with respect to relevant weekly time periods		
3/09/17	JMS	Review badge swipes and time records for Marye Ward		
3/09/17	JMS	Draft and revise spreadsheet regarding time records of Marye Ward; Correspondence to Peter A. Saba x2 regarding the same		
3/09/17	JMS	Telephone conference with opposing counsel regarding change of representation; Conference with the client regarding the same		
3/09/17	JMS	Receipt and review from mediator's office regarding pre-mediation conference; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
3/09/17	PAS	Receipt and review of correspondence from mediator		
3/09/17	PAS	Receipt and review of correspondence from opposing counsel		
3/09/17	PAS	Review damage calculation for recruiter		
3/09/17	PAS	Conference with Joshua M. Smith regarding recruiter damages and scheduling		
3/10/17	EFP	Finalize joint motion to amend calendar; Convert documents produced to searchable text		
3/10/17	EFP	Convert documents produced to searchable text		
3/10/17	JMS	Revise damages spreadsheet for Wahid Lewis and Marye Ward		
3/10/17	JMS	Revise motions to amend calendar order; Correspondence to opposing counsel regarding the same		
3/10/17	PAS	Conference with Joshua M. Smith regarding issues with meeting mediator		
3/10/17	PAS	Review and revise motion for extension of scheduling order		
3/11/17	JMS	Revise damages spreadsheet		
3/11/17	JMS	Review badge swipes and team schedules		

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Date	Int	Professional Services	Hours	Amount
3/11/17	JMS	Telephone conference with the client regarding mediation and status		
3/13/17	EFP	Review Peter A. Saba availability for conference call with mediator		
3/13/17	JMS	Receipt and review of correspondence from opposing counsel regarding revisions to joint motion to amend calendar order; Telephone conference with Peter A. Saba regarding the same		
3/13/17	PAS	Receipt and review of correspondence from opposing counsel		
3/13/17	PAS	Conference with Joshua M. Smith regarding additional discovery for mediation		
3/14/17	EFP	Review spreadsheets produced by opposing counsel regarding missing weeks		
3/14/17	JMS	Telephone conference with opposing counsel regarding joint motion revisions; Revise the same; Telephone conference with Peter A. Saba regarding the same; Correspondence to Peter A. Saba regarding the same; Correspondence to opposing counsel regarding revised joint motion		
3/15/17	EFP	Conference with Joshua M. Smith regarding issues with language, finalize joint motion to amend calendar order and file joint motion		
3/15/17	JMS	Receipt and review of correspondence from opposing counsel regarding joint motions to amend calendar order; Correspondence to Emma F. Paxton regarding the same; Telephone conference with Emma F. Paxton regarding the same		
3/15/17	PAS	Receipt and review of correspondence from mediator		
3/15/17	PAS	Receipt and review of correspondence from the Court x2		
3/15/17	PAS	Conference with Joshua M. Smith regarding issues with discovery during mediation preparation		
3/20/17	JMS	Prepare for and attend status conference with the Court		
3/20/17	PAS	Prepare for and attend conference with the Court		
3/20/17	PAS	Receipt and review of correspondence from mediator		
3/20/17	PAS	Correspondence to mediator		
3/21/17	JMS	Conference with the client regarding status update		
3/21/17	PAS	Receipt and review of correspondence from court reporter		

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3/22/17	EFP	Review minute entry regarding calendar order and mediation, review amended calendar order		
3/22/17	JMS	Receipt and review of correspondence from the Court regarding amended calendar order		
3/22/17	PAS	Receipt and review of correspondence from the Court x3		
3/23/17	JMS	Revise damages spreadsheet; Correspondence to Peter A. Saba regarding the same; Conference with Peter A. Saba regarding the same		
3/23/17	PAS	Review damage summary; Conference with Joshua M. Smith regarding revisions to damage information		
3/24/17	EFP	Conference with Joshua M. Smith regarding mediation deadlines		
3/24/17	JMS	Prepare for and attend pre-mediation telephone conference; Telephone conference with the client regarding the same		
3/24/17	PAS	Conference call with mediator regarding issues for mediation		
3/27/17	JMS	Draft website status update; Correspondence to Peggy Gruenke and Peter A. Saba regarding the same; Review website update; Correspondence to Peggy Gruenke regarding the same		
3/27/17	PAS	Review website modification		
3/28/17	EFP	Telephone conference with the client x2 regarding meeting		
3/28/17	JMS	Draft correspondence to opposing counsel regarding discovery deficiencies		
3/31/17	EFP	Finalize correspondence to opposing counsel regarding discovery deficiencies and email to opposing counsel regarding discovery deficiency letter		
3/31/17	PAS	Review and revise deficiency letter to opposing counsel		
4/01/17	JMS	Revise damages estimate		
4/07/17	JMS	Telephone conference with opposing counsel regarding discovery deficiencies; Telephone conference with Peter A. Saba regarding the same		
4/07/17	PAS	Receipt and review of correspondence from opposing counsel		
4/10/17	JMS	Review additional documents produced by defendant; Revise damages spreadsheet		

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4/10/17	PAS	Review correspondence from court reporter		
4/11/17	JMS	Revise damages spreadsheet		
4/13/17	JMS	Revise damages spreadsheet		
4/14/17	JMS	Draft mediation statement		
4/16/17	JMS	Draft mediation statement		
4/17/17	JMS	Draft mediation statement		
4/17/17	PAS	Conference with Joshua M. Smith regarding mediation statement and damages		
4/18/17	JMS	Correspondence to Peter A. Saba regarding damages spreadsheet and mediator engagement letter; Revise damages spreadsheet		
4/18/17	JMS	Draft mediation statement; Telephone conference with Peter A. Saba regarding the same		
4/18/17	PAS	Draft and revise mediation statement		
4/18/17	PAS	Receipt and review of correspondence from mediator		
4/19/17	EFP	Review expenses for mediation and mediation statement, conference with Joshua M. Smith regarding issues with mediation statement		
4/19/17	JMS	Draft and revise mediation statement		
4/19/17	JMS	Revise damages spreadsheet		
4/19/17	JMS	Correspondence to mediator regarding mediation statement		
4/19/17	PAS	Conference with Joshua M. Smith regarding additional changes to mediation statement; Draft and revise mediation statement		
4/20/17	EFP	Finalize mediation statement and email to mediator regarding mediation statement		
4/20/17	JMS	Multiple conferences with Peter A. Saba regarding mediation statement; Revise mediation statement		
4/20/17	PAS	Draft and revise mediation statement and estimate of damages		
4/20/17	SJS	Review Mediation Statement; Email Joshua Smith regarding Mediation Statement		
4/21/17	JMS	Telephone conference with Sharon J. Sobers regarding mediation		

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Date	Int	Professional Services	Hours	Amount
4/21/17	SJS	Telephone conference with Joshua Smith regarding Hardesty Mediation while Joshua is driving back from OELA conference		
4/22/17	JMS	Prepare for mediation		
4/23/17	JMS	Prepare for mediation; Correspondence to Peter A. Saba and Emma F. Paxton regarding the same		
4/24/17	EFP	Prepare for mediation		
4/24/17	JMS	Revise damages spreadsheet; Conference with Peter A. Saba regarding the same; Finalize damages spreadsheet		
4/24/17	JMS	Legal research regarding good faith affirmative defense and reliance upon advice of counsel		
4/24/17	PAS	Revise and recalculate financials for mediation		
4/24/17	PAS	Review lack of good faith issue for liquidated damages		
4/24/17	PAS	Telephone conference with the client regarding mediation preparation		
4/24/17	PAS	Review and revise additional damage calculations		
4/24/17	PAS	Conference with Joshua M. Smith regarding changes to damages calculations		
4/24/17	PAS	Review additional terms for mediation		
4/25/17	JMS	Prepare for and attend mediation; Conference with the client regarding the same		
4/25/17	JMS	Draft spreadsheet regarding discrepancies in Kroger damages calculation		
4/25/17	PAS	Attend mediation; Conference with Joshua M. Smith regarding issues with mediation and damage calculations		
4/26/17	JMS	Draft and revise spreadsheet regarding discrepancies in Kroger damages calculation		
4/26/17	JMS	Telephone conference with opposing counsel regarding discovery and scheduling of depositions		
4/26/17	JMS	Correspondence with the court regarding mediation outcome; Draft memo to file regarding the same		
4/26/17	JMS	Correspondence with Opt-In Amanda Gayhart regarding status update		
4/26/17	JMS	Telephone conference with Derek Chipman regarding status update		

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4/26/17	PAS	Conference with Joshua M. Smith regarding mediation results and additional discovery		
4/27/17	JMS	Correspondence with opt-in Matt Taske regarding status update		
4/27/17	JMS	Draft and revise spreadsheet regarding discrepancies to aux code report utilized by defendant		
4/27/17	SJS	Telephone conference regarding calculation of damages for FLSA action, including putting Emma on the stand, using an expert, getting admissions from Defendant, and phone records vs badge swipes		
4/28/17	JMS	Telephone conference with Marcus LaCour regarding issues related to mediation and settlement		
4/28/17	JMS	Correspondence with Madeline Hickey regarding settlement and mediation		
5/01/17	JMS	Correspondence with opposing counsel regarding settlement discussions and deposition dates		
5/01/17	JMS	Revise spreadsheet regarding discrepancies in aux report		
5/02/17	JMS	Revise spreadsheet regarding discrepancies in aux time report of overtime hours worked		
5/02/17	JMS	Receipt and review of correspondence from opposing counsel regarding settlement discussions and deposition scheduling; Correspondence to opposing counsel regarding the same		
5/03/17	JMS	Review document production in conjunction with settlement discussions		
5/04/17	EFP	Review availability for depositions and conference with Peter A. Saba regarding same		
5/04/17	JMS	Receipt and review of correspondence from opposing counsel regarding depositions and further settlement discussions; Receipt and review of correspondence from opposing counsel		
5/04/17	PAS	Receipt and review of correspondence from opposing counsel		
5/05/17	EFP	Emails with opt-ins regarding deposition availability		
5/05/17	JMS	Correspondence with multiple opt-in plaintiffs regarding deposition scheduling		
5/05/17	JMS	Correspondence with opposing counsel regarding depositions and settlement discussions		

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5/05/17	JMS	Draft and revise spreadsheet regarding discrepancies in aux report damages provided by defendant		
5/08/17	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding damages spreadsheet regarding aux report discrepancies		
5/10/17	EFP	Draft and revise notice of deposition of Buck Moffett		
5/10/17	JMS	Correspondence with opposing counsel regarding depositions		
5/11/17	EFP	Revise and finalize notice of deposition of Buck Moffett, email to opposing counsel regarding notice of deposition, telephone conference with court reporter regarding deposition and email to court reporter regarding deposition		
5/11/17	JMS	Revise spreadsheet regarding discrepancies in aux reports		
5/11/17	JMS	Draft spreadsheet regarding revised damages based upon Kroger formula; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
5/12/17	EFP	Emails with court reporter regarding confirmation of deposition of Buck Moffett		
5/12/17	JMS	Review and revise damages spreadsheet regarding discrepancies in aux time records		
5/12/17	JMS	Telephone conference with Marye Ward regarding deposition; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
5/12/17	JMS	Telephone conference with the client regarding status update		
5/12/17	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding Daniele Williams employment		
5/12/17	PAS	Conference with Joshua M. Smith regarding issues with Marye Ward deposition		
5/14/17	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding Daniele Williams employment		
5/14/17	JMS	Draft and revise damages spreadsheet regarding aux record discrepancies		
5/15/17	EFP	Conference with Joshua M. Smith regarding deposition of Buck Moffett		

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5/15/17	JMS	Draft and revise spreadsheet regarding discrepancies and aux records provided by Kroger; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
5/15/17	JMS	Correspondence with Corbin Hom regarding deposition prep		
5/15/17	JMS	Correspondence with Marye Ward x2 regarding deposition scheduling; Correspondence with opposing counsel regarding depositions		
5/15/17	JMS	Prepare exhibit list for Buck Moffett deposition		
5/15/17	JMS	Review Buck Moffett Facebook profile; Correspondence to Emma F. Paxton regarding the same		
5/15/17	JMS	Telephone conference with the client regarding status update		
5/15/17	PAS	Receipt and review of correspondence from opposing counsel		
5/16/17	EFP	Review Buck Moffett's Facebook profile regarding references to Kroger		
5/16/17	JMS	Review documents in preparation for Buck Moffett deposition		
5/16/17	JMS	Draft and revise damages spreadsheet regarding discrepancies in aux reports; Correspondence x2 with Sharon J. Sobers regarding the same		
5/16/17	JMS	Draft rule 23(b) motion for certification		
5/16/17	JMS	Receipt and review of deposition notices from defendant		
5/16/17	SJS	Review FLSA spreadsheet showing discrepancy between time reported on schedules and time reported on phone records; Email responding to email from Joshua M. Smith regarding spreadsheet		
5/17/17	JMS	Correspondence with Corbin Hom regarding deposition		
5/17/17	JMS	Receipt and review of correspondence from opposing counsel regarding depositions		
5/17/17	JMS	Review documents in preparation for deposition of Buck Moffett		
5/17/17	JMS	Draft exhibit list; Correspondence to Emma F. Paxton regarding the same		
5/18/17	EFP	Prepare exhibits to Buck Moffett deposition		
5/18/17	JMS	Correspondence with Kelly Rutledge regarding deposition		
5/18/17	JMS	Conference with Peter A. Saba regarding deposition of Buck Moffett		
5/18/17	JMS	Prepare for conference with Corbin Hom		

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5/18/17	PAS	Conference with Joshua M. Smith regarding exhibits for Buck Moffett deposition		
5/19/17	JMS	Prepare for conference with Corbin Hom		
5/19/17	JMS	Prepare for conference with Corbin Hom		
5/22/17	JMS	Correspondence with Kelly Rutledge regarding deposition		
5/22/17	JMS	Correspondence with Peter A. Saba and Sharon J. Sobers regarding Corbin Hom and issues related to phone screening		
5/22/17	JMS	Correspondence with multiple opt-ins regarding depositions		
5/22/17	JMS	Multiple correspondence with opposing counsel regarding depositions		
5/22/17	JMS	Conference with Peter A. Saba regarding deposition of Buck Moffett; Correspondence to Peter A. Saba regarding the same		
5/22/17	PAS	Review documents; Prepare for deposition of Buck Moffett		
5/23/17	JMS	Prepare for and attend deposition of Buck Moffett		
5/23/17	JMS	Draft and revise motion to certify under rule 23(b)		
5/23/17	JMS	Correspondence with Sharon J. Sobers regarding Buck Moffett deposition		
5/23/17	PAS	Prepare for and take deposition of Buck Moffett		
5/23/17	SJS	Telephone conference with Joshua M. Smith regarding Buck Moffett's deposition		
5/24/17	JMS	Prepare for and attend deposition preparation session with Kelly Rutledge		
5/24/17	JMS	Receipt and review of notices of deposition for Marye Ward and Matt Taske		
5/24/17	JMS	Follow-up correspondence with Kelly Rutledge regarding deposition		
5/24/17	JMS	Correspondence to Corbin Hom regarding deposition		
5/25/17	JMS	Correspondence with Kim Burchett regarding deposition; Multiple telephone conferences with Kim Burchett regarding the same		
5/25/17	JMS	Telephone conference with opposing counsel regarding rescheduling deposition; Correspondence with Kim Burchett regarding the same		

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5/25/17	JMS	Receipt and review of correspondence from opposing counsel regarding additional document production		
5/25/17	JMS	Review of documents produced by defendant		
5/25/17	JMS	Correspondence with Marye Ward regarding deposition		
5/25/17	JMS	Prepare for, travel to and attend deposition of Kelly Rutledge		
5/25/17	JMS	Draft and revise motion to certify		
5/25/17	PAS	Receipt and review of correspondence from opposing counsel x2		
5/25/17	PAS	Conference with Joshua M. Smith regarding issues with AUX emails and additional discovery needed		
5/26/17	JMN	Conference with Joshua M. Smith regarding deposition		
5/26/17	JMS	Prepare for, travel to and attend deposition of Corbin Hom		
5/26/17	JMS	Draft and revise motion for certification under Rule 23(b)(3)		
5/26/17	JMS	Correspondence with Jeffrey M. Nye regarding employee job description and exempt status of employees		
5/27/17	JMS	Draft and revise motion to certify under Rule 23(b)(3); Correspondence to Peter A. Saba regarding the same		
5/30/17	JMS	Correspondence with Kim Burchett regarding deposition; Correspondence to opposing counsel regarding the same; Attempt telephone conference with opposing counsel regarding the same; Travel to opposing counsel office for potential scheduled deposition; Correspondence with opposing counsel regarding rescheduling of depositions		
5/30/17	PAS	Receipt and review of Marye Ward schedule and overtime worked		
5/31/17	EFP	Telephone conference with court reporter x2 regarding Buck Moffett deposition and receipt and review of transcript of Buck Moffett deposition x2		
5/31/17	JMS	Prepare for deposition of Marye Ward		
5/31/17	JMS	Receipt and review of correspondence from Sharon J. Sobers regarding motion to certify		
5/31/17	JMS	Revise Rule 23(b) motion for certification		
5/31/17	JMS	Draft affidavit of counsel in support of the same		

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5/31/17	JMS	Correspondence with opposing counsel regarding deposition of Kim Burchett; Correspondence with Kim Burchett regarding the same		
5/31/17	JMS	Correspondence with Marye Ward regarding deposition		
5/31/17	SJS	Review draft of motion for class certification		
6/01/17	EFP	Receipt and review of correspondence from court reporter regarding Moffett errata sheet		
6/01/17	JMS	Attend deposition preparation with the client		
6/01/17	JMS	Travel to and attend deposition of the client		
6/01/17	JMS	Correspondence with opposing counsel regarding deposition transcripts and filing with briefings		
6/01/17	JMS	Telephone conference with Rhonda Furr regarding suspension without pay		
6/01/17	JMS	Draft and revise Motion to Certify under Rule 23(b)		
6/01/17	PAS	Receipt and review of correspondence from opposing counsel		
6/02/17	JMS	Revise motion to certify and affidavits to the same; Correspondence with Sharon J. Sobers regarding the same		
6/02/17	JMS	Deposition preparation with Kim Burchett		
6/02/17	JMS	Travel to and attend deposition of Kim Burchett		
6/02/17	SJS	Finish review of Rona Schiff deposition; Telephone conference with Joshua M. Smith regarding Strosnider Deposition, sealing documents for filing with Court, affidavit identifying documents		
6/02/17	SJS	Email CBA Journal "Shane Group" article regarding sealing documents to Joshua M. Smith; Email sample Affidavit identifying documents to Joshua M. Smith		
6/02/17	SJS	Review fact section of Motion to Certify 23(b) Class		
6/03/17	PAS	Review and revise rule 23 motion for certification		
6/03/17	PAS	Review testimony from Buck Moffett deposition		
6/03/17	SJS	Review Motion to Certify 23(b) class and redline proposed changes		
6/03/17	SJS	Enter additional changes into redline for Motion to Certify 23(b) Class		

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6/03/17	SJS	Email redline of Motion to Certify 23(b) Class to Joshua M. Smith with comments		
6/05/17	JMS	Draft correspondence to opposing counsel regarding outstanding discovery; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
6/05/17	JMS	Correspondence to opposing counsel		
6/05/17	JMS	Correspondence with Matt Taske regarding deposition		
6/05/17	JMS	Telephone conference with Matt Taske regarding deposition preparation		
6/05/17	JMS	Conference with Peter A. Saba regarding motion to certify		
6/05/17	JMS	Receipt and review of redline to motion to certify from Peter A. Saba		
6/06/17	EFP	Make changes to agreed motion to file under seal and finalize affidavit of Peter A. Saba		
6/06/17	JMS	Prepare for, travel to and attend deposition of Matt Taske		
6/06/17	JMS	Receipt and review of motion to file under seal		
6/06/17	JMS	Correspondence to Emma F. Paxton regarding the same		
6/06/17	JMS	Correspondence to opposing counsel regarding the same		
6/06/17	PAS	Review and revise affidavit of counsel		
6/07/17	EFP	Receipt and review of Buck Moffett deposition transcripts		
6/07/17	EFP	Finalize joint motion to file under seal and entry granting motion; File joint motion and entry; Email from the Court regarding joint motion; Email to the Judge regarding joint motion and entry		
6/07/17	EFP	Review deposition notes and exhibits to Buck Moffett deposition		
6/07/17	JMS	Revise motion to certify		
6/07/17	JMS	Correspondence with opposing counsel regarding motion for leave to file under seal; Receipt and review of revisions to the same; Correspondence with opposing counsel regarding the same		
6/08/17	EFP	Telephone conference with court reporter x2 regarding ordering deposition transcripts		
6/08/17	EFP	Receipt and review of correspondence from the Court regarding order granting motion to file under seal		

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6/08/17	EFP	Conference with Joshua M. Smith regarding issues with sealed filings		
6/08/17	EFP	Research regarding filing sealed documents		
6/08/17	EFP	Receipt and review of depositions from court reporter		
6/08/17	JMS	Draft and revise motion for certification; Draft exhibits and documents related to the same; Review exhibits; Draft citations to the same		
6/08/17	PAS	Conference with Joshua M. Smith regarding issues with changes to motion for certification; Review testimony of Marye Ward; Receipt and review of correspondence from the Court; Receipt and review of correspondence from opposing counsel x2		
6/08/17	SJS	Legal research regarding additional citation in support of quote from Swigart in 23(b) motion for class certification		
6/08/17	SJS	Review counsel affidavit		
6/09/17	EFP	Finalize affidavit of Joshua M. Smith		
6/09/17	EFP	Revise and finalize class action notice		
6/09/17	EFP	Revise and finalize exclusion request form		
6/09/17	EFP	Receipt and review of Kelly Rutledge deposition transcript		
6/09/17	EFP	Draft and revise notice of filing Joshua M. Smith affidavit under seal		
6/09/17	EFP	Draft and revise notice of filing deposition exhibits under seal		
6/09/17	EFP	Revise and finalize affidavit of Sharon J. Sobers		
6/09/17	EFP	Draft and revise notice of filing deposition transcripts		
6/09/17	EFP	Prepare transcripts for filing		
6/09/17	EFP	File notice of filing deposition transcripts and transcripts of depositions		
6/09/17	EFP	Prepare exhibits to transcripts for filing		
6/09/17	EFP	File exhibits to transcripts		
6/09/17	EFP	Revise and finalize exhibits to motion		
6/09/17	EFP	Revise and finalize motion to certify class		
6/09/17	EFP	File motion to certify class		
6/09/17	EFP	File sealed exhibits		

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6/09/17	EFP	Emails to the Court and opposing counsel regarding filings		
6/09/17	EFP	Set up Dropbox for filings		
6/09/17	EFP	Email to opposing counsel regarding Dropbox		
6/09/17	JMS	Revise motion for certification		
6/09/17	JMS	Review and revise affidavits and related documentation for motion for certification		
6/09/17	JMS	Conference with Sharon J. Sobers regarding letter to potential class members regarding certification of Ohio action		
6/09/17	JMS	Conference with Emma F. Paxton regarding filing exhibits and deposition transcripts		
6/09/17	JMS	Receipt and review of motion to decertify		
6/09/17	PAS	Receipt and review of correspondence from the Court x8		
6/09/17	SJS	Review and sign counsel affidavit		
6/09/17	SJS	Review and revise letter to potential 23(b) class members regarding receipt of exclusion form		
6/09/17	SJS	Review fact section of motion to decertify class		
6/12/17	JMS	Receipt and review of invoice from opposing counsel regarding Kim Burchett deposition cancellation; Correspondence to Emma F. Paxton regarding the same		
6/12/17	PAS	Conference with Joshua M. Smith regarding issues with motion to decertify		
6/14/17	JMS	Review of deposition of Corbin Hom		
6/15/17	EFP	Review Hom deposition transcript, exhibits, and invoice; Email to Corbin Hom regarding transcript and errata sheet		
6/15/17	EFP	Review deadlines for memorandum in opposition to and reply in support of rule 23 motions		
6/15/17	JMS	Legal research regarding cases cited by defendant in motion to decertify; Draft memo regarding the same; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
6/15/17	PAS	Conference with Joshua M. Smith regarding issues with additional discovery from defendant		

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6/16/17	JMS	Legal research regarding motion to decertify and standards with respect to similarly situated employees; Draft memo to file regarding the same		
6/16/17	JMS	Draft update to website regarding motion for class certification and motion to decertify		
6/19/17	JMS	Legal research regarding issues related to "similarly situated" determinations and non-critical dissimilarities in class members		
6/19/17	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding filing deadlines		
6/19/17	JMS	Correspondence with Peggy Gruenke regarding website update		
6/20/17	JMS	Draft and revise memorandum in opposition to motion for decertification		
6/20/17	JMS	Correspondence with Marye Ward regarding Kroger updates		
6/21/17	JMS	Draft and revise memorandum in opposition to motion for decertification		
6/22/17	JMS	Draft memorandum in opposition to motion for decertification		
6/22/17	JMS	Receipt and review of correspondence from Jeffrey M. Nye regarding recent decision from Sixth Circuit regarding FLSA and decertification		
6/23/17	JMS	Draft and revise memorandum in opposition to motion to decertify		
6/24/17	SJS	Review defendant's motion to decertify collective action, review Tomich memo regarding administrative exemption from other collective action litigation, review CFR regulation on use of manuals as that task relates to the administrative exemption, review part of new 6th Circuit Monroe decision		
6/24/17	SJS	Review Hom deposition		
6/26/17	JMS	Draft and revise memorandum in opposition to motion to decertify		
6/27/17	JMS	Draft and revise memorandum in opposition to motion to decertify		
6/29/17	JMS	Revise memorandum in opposition to motion to decertify		
6/30/17	JMS	Draft and revise memorandum in opposition to motion to decertify		
7/05/17	JMS	Revise memorandum in opposition to motion to decertify; Telephone conference with Sharon J. Sobers regarding the same; Conference with Peter A. Saba regarding memorandum in opposition to motion to decertify		

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7/06/17	JMS	Revise memorandum in opposition to motion to decertify; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same		
7/10/17	SJS	Review draft of memorandum in opposition to defendant's motion to decertify FLSA class		
7/12/17	SJS	Draft memo regarding tasks performed by all recruiters as identified in Schiff deposition		
7/13/17	SJS	Review draft of memorandum in opposition to defendant's motion for decertification of FLSA class		
7/15/17	SJS	Draft redline of memorandum in opposition to defendant's motion to decertify FLSA class		
7/18/17	JMS	Correspondence to Marye Ward regarding issues with retaliation		
7/18/17	JMS	Revise memorandum in opposition to motion for decertification		
7/18/17	JMS	Receipt and review of correspondence from Sharon J. Sobers regarding draft memorandum in opposition to motion for decertification		
7/18/17	SJS	Legal research regarding binding nature of 30(b)(6) deposition		
7/18/17	SJS	Draft proposed language regarding legal research for memorandum in opposition decertification		
7/19/17	JMS	Revise memorandum in opposition to motion for decertification		
7/20/17	EFP	Review and revise memorandum in opposition to motion to decertify		
7/20/17	JMS	Telephone conference with Sharon J. Sobers regarding memorandum in opposition to motion for decertification; Edit and revise memorandum in opposition to motion for decertification; Correspondence to Emma F. Paxton regarding the same		
7/20/17	SJS	Telephone conference with Joshua M. Smith regarding draft of memorandum in opposition decertification of FLSA class; Revise memo regarding list of tasks performed by all recruiters identified in Schiff deposition; Prepare redline of memo		
7/21/17	EFP	Receipt and review of Matt Taske deposition transcript		
7/21/17	EFP	Enter changes to memorandum in opposition to motion to decertify; Review documents produced by Kroger; Revise recruiter spreadsheet regarding additional opt-in plaintiffs		

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7/21/17	EFP	Review documents produced by Kroger		
7/21/17	EFP	Revise recruiter spreadsheet regarding additional opt-in plaintiffs		
7/21/17	JMS	Revise memorandum in opposition to motion for decertification; Correspondence to Peter A. Saba regarding the same		
7/21/17	PAS	Receipt and review of correspondence from the Court		
7/21/17	SJS	Review Defendant's Motion for Decertification; Review Draft of Memo in Opposition to Defendant's Motion for Decertification		
7/22/17	SJS	Legal research regarding Motions to Decertify in misclassification cases in the Sixth Circuit; Legal Research: Review Benson v. Asurian decision and related cases.		
7/23/17	PAS	Review and outline issues with defendants' motion to decertify; Review and revise memorandum in opposition to motion to decertify		
7/24/17	EFP	Enter changes to Affidavit		
7/24/17	JMS	Revise memorandum in opposing motion for decertification; Telephone conference with Peter Saba regarding memorandum		
7/24/17	PAS	Conference with Joshua M. Smith x2 regarding issues with memorandum in opposition to motion to decertify		
7/24/17	PAS	Review and revise notes to changes to memorandum		
7/24/17	PAS	Receipt and review of correspondence from the Court x4		
7/24/17	SJS	Legal research regarding Decertification standards in the Sixth Circuit, including meaning of "individualized analysis" of plaintiffs' claims and "individualized defenses"		
7/25/17	JMS	Revise memorandum opposing motion to decertify; Telephone conference with Pete Saba regarding memorandum; Telephone conference with Sharon Sobers regarding legal research related to decertification and administrative exemption		
7/25/17	JMS	Telephone conference with Sharon Sobers regarding legal research related to decertification and administrative exemption		
7/25/17	PAS	Review and revise memorandum in opposition to motion to decertify; Conference with Joshua M. Smith regarding revisions to memorandum in opposition		

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7/25/17	SJS	Email Joshua Smith regarding decertification/misclassification cases in the Sixth Circuit		
7/25/17	SJS	Telephone conference with Joshua Smith regarding Peter Saba comments on draft of Memorandum in Opposition to Motion for Certification		
7/26/17	JMS	Revise memorandum opposing motion to decertify; Two telephone conferences with Sharon J. Sobers regarding the motion to decertify; Draft affidavit in support of memorandum		
7/26/17	JMS	Two telephone conferences with Sharon J. Sobers regarding the motion to decertify		
7/26/17	JMS	Draft affidavit in support of memorandum		
7/26/17	PAS	Review and revise memorandum in opposition to motion to decertify; Conference with Joshua M. Smith regarding issues with memorandum in opposition		
7/26/17	SJS	Review Revision of Memorandum in Opposition, telephone conference with Joshua Smith regarding Kroger interpretation of whether individualized analysis was mandated for administrative exemption, email Joshua Smith regarding case law defining first prong of decertification analysis, language from O'Brien decision, interpretation of "individualized theories" and suggested revisions for revised version of Memorandum in Opposition		
7/26/17	SJS	Telephone conference with Joshua M. Smith regarding Peter A. Saba's comments on Memorandum in Opposition to Motion for Decertification with respect to individualized theories and the administrative exemption, review Legal Analysis section of Memorandum in Opposition and email additional corrections to Joshua Smith		
7/27/17	PAS	Conference with Joshua M. Smith regarding finalization of memorandum in opposition; Conference with Joshua M. Smith regarding filing extensions		
7/27/17	SJS	Telephone conference with Joshua Smith regarding final edit of Memorandum in Opposition to Motion for Decertification; Revise Introduction, Table of Contents, and Fact sections of Memorandum in Opposition to Defendant's Motion for Decertification; Revise legal analysis section of Memorandum in Opposition to Defendant's Motion for Decertification		

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7/28/17	JMS	Revise memorandum in opposing motion to certify; Conference with Sharon Sobers regarding motion to certify		
7/28/17	JMS	Receipt and review of correspondence regarding request for extension of filing memoranda in opposition		
7/28/17	JMS	Receipt and review of draft joint motion to extend filing deadline		
7/28/17	JMS	Revise memorandum in opposing motion for decertification		
7/28/17	JMS	Conference with Jourdan Custard regarding opposing motion		
7/28/17	JMS	Telephone conference with Peter Saba regarding opposing motion		
7/28/17	PAS	Conference with Joshua M. Smith regarding timing of filings and reply briefs; Receipt and review of correspondence from the Court; Receipt and review of correspondence from opposing counsel		
7/28/17	SJS	Email Joshua Smith twice regarding whether Kroger believes the administrative exemption applies to all recruiters; Review responding email from Joshua Smith; Telephone conference with Joshua Smith regarding status of Memorandum in Opposition to Motion for Decertification, Defendant's request for extension.		
7/31/17	JMS	Final review of memorandum in opposing motion for decertification		
7/31/17	JMS	Telephone conference with Peter Saba regarding opposing motion		
7/31/17	JMS	Conference with Jourdan Custard regarding filing and revisions to the opposing motion		
7/31/17	JMS	Correspondence to Sharon Sobers and Peter Saba regarding litigation strategy and upcoming deadlines		
8/01/17	PAS	Receipt and review of correspondence from the Court		
8/01/17	SJS	Respond to email from Joshua Smith regarding update on FLSA case and next steps		
8/01/17	SJS	Review NELA website for FLSA information, legal research regarding damage calculation in misclassification cases		
8/01/17	SJS	Telephone conference with Joshua M. Smith regarding filing documents under seal with respect to Judge Black's Order on the Parties Joint Motion to file under Seal		

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8/01/17	SJS	Telephone conference with Joshua Smith regarding FLSA litigation after filing Memorandum in Opposition Defendant's Motion for Decertification		
8/02/17	JMS	Receipt and review of defendant's memorandum in opposition to plaintiff's motion for rule 23(b) certification		
8/02/17	JMS	Telephone conference with Sharon Sobers regarding the memorandum		
8/02/17	PAS	Receipt and review of correspondence from the Court x2		
8/02/17	SJS	Telephone conference with Joshua M. Smith regarding meeting with Peter regarding next steps in FLSA litigation, declarations filed with Defendant's Memorandum in Opposition to Motion for 23(b)(3) certification		
8/03/17	EFP	Review filed memorandum in opposition to motion to decertify and depositions		
8/03/17	JMS	Telephone conference with Sharon J. Sobers regarding upcoming discovery issues and litigation strategy		
8/03/17	JMS	Draft memo to file regarding the upcoming discovery issues and litigation strategy		
8/03/17	PAS	Conference with Joshua M. Smith regarding issues with additional discovery		
8/03/17	SJS	Review Kaiser decision regarding use of interrogatories in calculation of damages, forward decision to Joshua M. Smith for meeting with Peter A. Saba		
8/03/17	SJS	Review Defendant's Memorandum in Opposition to Plaintiffs' Motion to Certify 23(b)(3) class		
8/03/17	SJS	Telephone planning session with Joshua M. Smith regarding what is needed regarding merits discovery for FLSA, possibly moving trial date, calculation of damages		
8/04/17	EFP	Receipt and review of deposition exhibits for Chris Weiler and Rana Schiff		
8/04/17	SJS	Legal research on administrative exemption regarding production/administrative distinction, matters of significance		
8/05/17	SJS	Legal research regarding damage calculation		
8/07/17	SJS	Review portions of Novartis settlement regarding damage calculations		

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8/09/17	SJS	Legal research regarding update 6th Circuit decisions regarding the FLSA Administrative exemption, Review Burton.Appriss.6th Cir 2017, legal research regarding review of 6th Circuit decisions regarding administrative exemption		
8/10/17	SJS	Legal Research regarding 6th Circuit decisions on administrative exemption, Quicken Loan, Little Belle, Foster vs Nationwide		
8/11/17	SJS	Continued legal research regarding administrative exemption, 6th Circuit		
8/16/17	JMS	Review of defendant's memorandum in opposition to motion for class certification		
8/16/17	SJS	Legal Research regarding Stultz decision and other caselaw in the Sixth Circuit on FLSA administrative exemption		
8/17/17	JMS	Review of defendant's memorandum in opposing motion to certify		
8/17/17	JMS	Correspondence with Sharon J. Sobers regarding opposing motion		
8/17/17	JMS	Legal research regarding certification		
8/17/17	JMS	Prepare reply in support of motion for certification		
8/17/17	SJS	Email legal research on the administrative exemption to Joshua M. Smith		
8/17/17	SJS	Draft Outline of Reply Brief and Note on the Production/Administrative dichotomy in the Sixth Circuit, forward Outline to Joshua M. Smith		
8/18/17	EFP	Summarize recruiter aux data		
8/18/17	JMS	Draft and revise reply in support of motion for certification		
8/18/17	JMS	Correspondence to Kelly Rutledge regarding deposition and motion for class certification		
8/18/17	SJS	Review Ogden Decision, email Joshua M. Smith regarding interaction of 29 CFR 541.201(b) and 541.203(e), legal research regarding 6th Circuit overtime class actions under Dukes; Review Hendricks decision, legal research, f Finish review of Wade Trucking decision; Add comments to notes on research of administrative exemption in the SIxth Circuit.		
8/21/17	JMS	Draft reply in support of motion for 23(b) certification		
8/21/17	SJS	Legal research: review DOL Field Operations handbook for rules regarding administrative exemption		

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8/22/17	EFP	Telephone conference with the Court regarding status conference		
8/22/17	JMS	Draft and revise reply in support of motion for 23(b) certification		
8/22/17	JMS	Attend telephone status conference with the court		
8/22/17	JMS	Conference with Peter A. Saba regarding motion for 23(b)		
8/22/17	JMS	Receipt and review of legal research memo from Sharon J. Sobers regarding reply in support of motion for rule 23(b) certification		
8/22/17	PAS	Conference with Joshua M. Smith regarding issues with scheduling and additional discovery; Receipt and review of correspondence from the Court x2		
8/22/17	SJS	Legal Research regarding cases addressing 29 CFR 541.203(e), administrative exemption does not apply to clerical HR employees		
8/24/17	JMS	Draft and revise reply in support of motion for rule 23(b) certification		
8/24/17	SJS	Review Reply in Support of Motion for 23(b)(3) certification, telephone conference with Joshua M. Smith, Esq. regarding Reply in Support of Motion, prepare redline for first half of Reply in Support of Rule 23(b)(3) certification		
8/25/17	JMS	Conference with Sharon J. Sobers regarding revisions to reply in support of rule 23(b) certification		
8/25/17	SJS	Prepare redline for second half of Reply in Support of 23(b)(3) certification		
8/27/17	PAS	Review defendant's memorandum in opposition to motion to certify; Review and revise reply in support to motions to certify		
8/28/17	EFP	Review filed depositions; Review employment status of opt-ins at time of opting in; Finalize reply in support of motion to certify; File reply in support; File deposition of Courtney Strosnider; Draft and revise notice of filing exhibits under seal; File notice; File exhibits to the deposition of Courtney Strosnider		
8/28/17	EFP	Review employment status of opt-ins at time of opting in		
8/28/17	EFP	Revise and finalize reply in support of motion to certify		
8/28/17	EFP	File reply in support		
8/28/17	EFP	File deposition of Courtney Strosnider		
8/28/17	EFP	Draft and revise notice of filing exhibits under seal		

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8/28/17	EFP	File notice		
8/28/17	EFP	File exhibits to the deposition of Courtney Strosnider		
8/28/17	JMS	Revise reply in support of motion for rule 23(b) certification; Conference with Peter A. Saba twice regarding the motion		
8/28/17	PAS	Conference with Joshua M. Smith regarding changes to reply in support of motion to certify; Review and revise reply in support of motion to certify		
8/31/17	JMS	Conference with Peter A. Saba regarding upcoming discovery		
9/06/17	JMS	Telephone conference with Sharon J. Sobers regarding upcoming discovery and damages issues		
9/06/17	JMS	Legal research regarding damages issues		
9/07/17	JMS	Draft website update; Correspondence to Peggy Gruenke regarding website updates		
9/08/17	JMS	Telephone conference regarding status update		
9/08/17	JMS	Legal research regarding damages and FLSA claims		
9/08/17	JMS	Draft legal research memo regarding damages and FLSA claims		
9/08/17	JMS	Conference with Peter A. Saba regarding damages and FLSA claims		
9/08/17	PAS	Conference with Joshua M. Smith regarding scheduling issues and trial plan		
9/08/17	SJS	Review Plaintiffs' Reply in Support of 23(b)(3) certification, review Defendant's Reply in Support of Decertification of FLSA class		
9/08/17	SJS	Review documents, spreadsheets regarding FLSA damage calculation		
9/11/17	SJS	Telephone conference with Joshua Smith regarding damage calculation		
9/12/17	JMS	Conference with Peter A. Saba regarding discovery schedule		
9/12/17	SJS	Review Burchett Deposition, Interrogatories regarding calculation of damages		
9/13/17	JMS	Legal research regarding damages and trial management		
9/13/17	JMS	Draft legal research memo regarding damages and trial management		
9/13/17	JMS	Correspondence to Peter A. Saba regarding damages and trial management		

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9/13/17	SJS	Review Hom Deposition, Interrogatories regarding calculations of damages		
9/14/17	JMS	Legal research regarding damages issues in preparation for conference with Sharon J. Sobers		
9/14/17	JMS	Conference with Peter A. Saba regarding upcoming deadlines and discovery issues		
9/14/17	PAS	Conference with Joshua M. Smith regarding scheduling and additional depositions		
9/14/17	SJS	Legal Research regarding calculation of damages		
9/15/17	EFP	Draft and revise attorney's fees summary; Draft and revise correspondence to opposing counsel regarding attorney's fees summary; Email to opposing counsel		
9/15/17	JMN	Conference with Joshua M. Smith and Sharon J. Sobers regarding extraction of data from PDF report produced by defendant		
9/15/17	JMS	Review of correspondence to opposing counsel regarding attorney's fees to date		
9/15/17	JMS	Conference with Sharon J. Sobers regarding trial strategy and damages issues		
9/15/17	SJS	Conference in office with Joshua Smith regarding next steps		
9/18/17	JMS	Correspondence regarding upcoming deadlines and issues related to discovery		
9/19/17	JMS	Receipt and review of correspondence regarding upcoming discovery issues and trial management		
9/19/17	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding discovery issues and trial management		
9/19/17	JMS	Draft and research outline to motion for summary judgment		
9/19/17	JMS	Correspondence regarding trial management and discovery issues		
9/19/17	PAS	Conference with Joshua M. Smith regarding scheduling and motion for summary judgment issues		
9/20/17	JMS	Receipt and review of correspondence regarding discovery issues and trial management		
9/20/17	JMS	Draft motion for summary judgment and outline		

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9/20/17	JMS	Legal research regarding summary judgment and outline		
9/21/17	JMS	Correspondence regarding good faith issue and attorney-client privilege waiver		
9/21/17	JMS	Draft motion to amend calendar order		
9/21/17	JMS	Correspondence regarding calendar order		
9/23/17	SJS	Start outline for Motion for Summary Judgment on merits of FLSA, 23(b)(3) claims		
9/23/17	SJS	Review Moffett Deposition and add information to Outline for MSJ on merits		
9/25/17	JMS	Review of draft motion to amend calendar order		
9/25/17	JMS	Correspondence to Emma F. Paxton regarding motion to amend calendar order		
9/25/17	SJS	Continue reading Moffett Deposition		
9/26/17	EFP	Finalize joint motion to amend calendar order; File joint motion; Email from the Court regarding filed motion		
9/26/17	PAS	Receipt and review of correspondence from the Court x2		
9/27/17	SJS	Review/Revise Outline for Hardesty Motion for Summary Judgment on Merits		
9/28/17	SJS	Review/revise/reorganize outline for Motion for Summary Judgment on Merits		
10/02/17	JMS	Receipt and review of correspondence regarding attorney client privilege and good faith defense issue		
10/02/17	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding attorney client privilege and good faith defense issue		
10/02/17	JMS	Review of Moffett deposition and related documents regarding attorney-client privilege objections		
10/03/17	JMS	Legal research and correspondence to Sharon J. Sobers regarding attorney-client privilege and good faith defense		
10/03/17	SJS	Respond to Joshua M Smith email on attorney client privilege with respect to Defendant's decision to withdraw "consultation with counsel" claim in support of their "good faith" defense		

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10/04/17	SJS	Draft Damage Interrogatories for Hardesty FLSA Opt-Ins; Compare to Joshua M Smith draft version of Interrogatories; Review/revise interrogatories		
10/05/17	JMS	Conference with Peter A. Saba regarding attorney client privilege waiver issue		
10/05/17	SJS	Review/revise damage interrogatories for Opt-Ins; Draft long and short versions; Forward drafts of damage interrogatories to Joshua M. Smith		
10/06/17	JMS	Legal research regarding attorney client privilege issues and stipulation of good faith evidence		
10/11/17	EFP	Research regarding FCRA class action against Kroger		
10/11/17	JMS	Receipt and review of related FCRA litigation against Kroger		
10/11/17	JMS	Review of file and pleadings regarding FCRA litigation		
10/11/17	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding FCRA litigation		
10/11/17	SJS	Locate materials on "common interest privilege" applicable to attorneys working on separate matters against the same client; Forward materials to Joshua M. Smith; Review materials from Joshua M. Smith regarding Fair Credit Reporting Act (FCRA) litigation filed against Kroger		
10/12/17	JMS	Draft and revise outline to motion for summary judgment		
10/13/17	JMS	Telephone conference regarding status update		
10/16/17	JMS	Draft and revise questionnaire to opt-in plaintiffs regarding damages		
10/17/17	JMS	Draft and revise interrogatories/questionnaires to opt-in plaintiffs regarding damages		
10/17/17	JMS	Correspondence to Sharon J. Sobers regarding damages		
10/17/17	JMS	Draft correspondence to opt-in plaintiffs regarding damages questionnaire		
10/17/17	JMS	Draft third set of discovery requests to defendant		
10/17/17	JMS	Telephone conference with Sharon J. Sobers regarding discovery request		
10/17/17	SJS	Telephone conference with Joshua M. Smith regarding Damage Interrogatories for Opt-Ins		
10/18/17	EFP	Receipt and review of notation order from the Court		

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10/18/17	JMS	Draft third set of discovery requests to defendant; Telephone conference with Sharon J. Sobers regarding discovery requests; Two telephone conference calls with Sharon J. Sobers regarding questionnaire to opt-in plaintiffs		
10/18/17	JMS	Telephone conference with Sharon J. Sobers regarding discovery requests		
10/18/17	JMS	Two telephone conference with Sharon J. Sobers regarding questionnaire to opt-in plaintiffs		
10/18/17	PAS	Receipt and review of correspondence from the Court		
10/18/17	SJS	Redraft Hardesty Damage Interrogatories to Opt-Ins		
10/19/17	JMS	Receipt and review of draft questionnaire to opt-ins		
10/19/17	JMS	Revise questionnaire to opt-ins		
10/19/17	JMS	Correspondence to Sharon J. Sobers regarding questionnaire to opt-ins		
10/19/17	SJS	Review of damage questionnaires for Opt-Ins, review/revise cover letter for Damage Interrogatories, forward to Joshua M. Smith		
10/19/17	SJS	Review draft of supplemental discovery requests to Defendant, draft summary of issues for motion for summary judgment and documents needed, forward comments on draft and summary to Joshua M. Smith		
10/19/17	SJS	Review Joshua M. Smith revisions to Damage Interrogatories, redline revisions and forward to Joshua M. Smith		
10/20/17	JMS	Draft and revise 3rd set of discovery requests to defendant		
10/23/17	JMS	Draft and revise third set of discovery requests		
10/23/17	JMS	Correspondence to Sharon J. Sobers regarding discovery requests		
10/23/17	JMS	Draft motion for summary judgment		
10/23/17	JMS	Draft and revise questionnaire on damages to opt-in plaintiffs		
10/24/17	JMS	Draft and revise damages questionnaire and attached correspondence to opt-in plaintiffs		
10/24/17	JMS	Telephone conference with Sharon J. Sobers regarding damages questionnaire and attached correspondence to opt-in plaintiffs		

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10/24/17	SJS	Telephone conference with Joshua M. Smith regarding a discovery request for dates of phone data information on phone records that Defendant has provided		
10/25/17	JMS	Draft and revise damages questionnaire to opt-ins		
10/26/17	JMS	Receipt and review of redline changes with respect to questionnaire to opt-ins		
10/26/17	SJS	Review/revise Damage questionnaires to Opt-Ins, forward redline to Joshua M. Smith		
10/27/17	JMS	Draft motion for summary judgment		
10/30/17	EFP	Finalize third set of discovery requests; Email to opposing counsel regarding third set of discovery requests		
10/30/17	JMS	Revise questionnaire to opt-ins		
10/30/17	JMS	Revise letter to opt-ins regarding questionnaire		
10/31/17	JMS	Draft and revise damages questionnaire to opt-ins		
10/31/17	JMS	Draft and revise cover letter to opt-ins regarding damages questionnaire		
10/31/17	JMS	Correspondence to Peter A. Saba regarding damages questionnaire to opt-ins		
11/01/17	SJS	Review current version of damage questionnaires to Opt-Ins		
11/02/17	JMS	Conference with Peter A. Saba regarding damages questionnaire to opt-ins and letter correspondence regarding damages questionnaire to opt-ins		
11/02/17	JMS	Revise correspondence to opt-ins regarding damages questionnaire		
11/02/17	PAS	Review and revise notice and questionnaire for class members		
11/03/17	JMS	Correspondence regarding extension of discovery cutoff		
11/03/17	JMS	Revise questionnaire to opt-ins regarding damages		
11/03/17	JMS	Telephone conference with Sharon J. Sobers regarding damages		
11/03/17	JMS	Telephone conference regarding damages questionnaire		
11/03/17	SJS	Telephone conference with Joshua M. Smith regarding Peter A. Saba's comments on the questionnaires to the Opt-Ins regarding damages		
11/06/17	JMS	Correspondence to Peter A. Saba regarding mediation invoice		

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11/07/17	JMS	Conference with Peter A. Saba regarding damages questionnaire to opt-in plaintiffs		
11/08/17	JMS	Review of motions to certify/decertify and opposition to the same for post-certification issues and summary judgment		
11/08/17	JMS	Draft and revise motion for summary judgment		
11/09/17	JMS	Correspondence regarding extension of discovery cutoff		
11/10/17	JMS	Draft and revise motion for summary judgment		
11/14/17	JMS	Draft motion to extend discovery cutoff		
11/16/17	JMS	Draft motion to vacate or extend discovery cutoff		
11/17/17	EFP	Finalize motion to vacate discovery cutoff; File motion to vacate discovery cutoff		
11/17/17	JMS	Draft and revise motion to vacate scheduling order		
11/17/17	PAS	Receipt and review of correspondence from the Court		
11/20/17	EFP	Receipt and review of filed motion to vacate		
11/20/17	JMN	Read CA6 decision in Perry v. Ranstad; Conference with Joshua M. Smith regarding same		
11/20/17	JMS	Receipt and review of Sixth Circuit decision regarding recruiters (Perry v. Randstad)		
11/20/17	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding the Sixth Circuit decision; Telephone conference with Sharon J. Sobers regarding the Sixth Circuit decision		
11/20/17	JMS	Telephone conference with Sharon J. Sobers regarding the Sixth Circuit decision		
11/20/17	SJS	Telephone conference with Joshua M. Smith regarding 6th Circuit decision in Perry v. Randstad		
11/21/17	JMS	Further review of Perry v. Randstad decision		
11/21/17	JMS	Correspondence with Sharon J. Sobers regarding the decision		
11/21/17	JMS	Telephone conference with Peter A. Saba regarding the decision		

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11/21/17	SJS	Review District Court decision in Perry v. Randstad, Type up Section of Perry v. Randstad Memo for Joshua M. Smith regarding US District Court decision, review Sixth Circuit decision in Perry v. Randstad, begin analysis of Perry v. Randstad decision, draft sections of Perry v. Randstad memo regarding Summary of Holding, Talent Acquisition Specialist position, Assistant Branch Manager position, Account Manager position		
11/22/17	JMS	Receipt and review of legal research memo from Sharon J. Sobers regarding Perry v. Randstad		
11/22/17	SJS	Review Perry v. Randstad cases, type up notes for Staffing Consultant position for Perry v. Randstad memo, review "Good Faith reliance" section of Perry v. Randstad decision, draft "good faith" section of Perry v. Randstad memo, forward draft of Memo to Joshua M. Smith		
11/27/17	JMS	Receipt and review of legal research memo from Sharon J. Sobers; Conference with Peter A. Saba regarding legal research memo		
11/27/17	PAS	Receipt and review of correspondence from the Court		
11/27/17	SJS	Review/revise Memo on Perry v. Randstad analysis, forward revised memo to Joshua M. Smith		
11/28/17	JMS	Receipt and review of correspondence from Sharon J. Sobers regarding Perry v. Randstad		
11/28/17	SJS	Email Joshua M. Smith responding to email regarding not filing supplemental memo on Perry v. Randstad decision		
11/29/17	JMS	Receipt and review responses to third set of discovery requests		
11/29/17	JMS	Draft and revise reply in support of motion to amend or vacate		
11/29/17	JMS	Draft affidavit of counsel in support		
11/29/17	JMS	Conference with Peter A. Saba regarding revisions to reply in support of motion to amend or vacate		
11/29/17	PAS	Review and revise reply brief; Conference with Joshua M. Smith regarding changes to reply brief		
11/30/17	EFP	Finalize reply in support of motion to amend; Finalize Joshua M. Smith affidavit; Prepare exhibits to Joshua M. Smith affidavit; File reply in support and affidavit		
11/30/17	JMS	Revise reply in support of motion to vacate or amend		

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Date	Int	Professional Services	Hours	Amount
11/30/17	PAS	Receipt and review of correspondence from the Court		
11/30/17	SJS	Begin drafting memo on Perry v. Randstad regarding which tasks are considered exempt work		
12/04/17	JMS	Telephone conference regarding status update		
12/04/17	SJS	Finish Memo to Joshua M. Smith on exempt/non-exempt tasks identified by the Court in Perry v. Randstad		
12/05/17	JMS	Receipt and review of correspondence regarding invoice; Correspondence to Peter A. Saba regarding invoice		
12/06/17	JMS	Review of memo from Sharon J. Sobers and analysis regarding Sixth Circuit decision (Perry) on recruiters		
12/06/17	SJS	Review/revise Second Memo to Joshua M. Smith on Perry v. Randstad-- Memo regarding exempt/non-exempt tasks, forward Memo to Joshua M. Smith		
12/07/17	JMS	Telephone conference regarding status update		
12/13/17	JMS	Telephone conference with the client regarding status update		
12/13/17	JMS	Legal research regarding class certification and post-certification discovery issues		
12/14/17	EFP	Draft and revise attorney's fees summary; Draft and revise correspondence to opposing counsel; Email to opposing counsel regarding attorney's fees summary		
12/14/17	JMS	Review of attorneys fees' summary		
12/28/17	JMS	Correspondence with opt-in Marcus Lacour regarding status update		
1/05/18	JMS	Correspondence with opt-in Marye Ward regarding status update		
1/26/18	JMS	Conference regarding status update		
1/26/18	JMS	Legal research regarding FLSA and certification timeline issues		
2/02/18	SJS	Review outline for summary judgment motion, try to determine what might need to be done		
2/13/18	JMS	Correspondence with Sharon J. Sobers regarding status update		
2/14/18	JMS	Telephone conference		

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Date	Int	Professional Services	Hours	Amount
2/14/18	JMS	Correspondence to Sharon J. Sobers and Peter A. Saba regarding anticipated date of decisions regarding certification		
2/15/18	PAS	Conference with Joshua M. Smith regarding issues with timing of issuance of motion for summary judgment decision		
3/23/18	JMS	Review of certification briefing and rules for appeal		
3/23/18	JMS	Legal research regarding the appeal		
3/23/18	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding the appeal		
4/23/18	SJS	Review US Supreme Court Encino Motor Cars decision		
5/10/18	PAS	Receipt and review of correspondence from the court x2		
5/11/18	PAS	Receipt and review of correspondence from the court reporter x3		
5/22/18	SJS	Telephone conference with Joshua M. Smith regarding status of appellate brief		
5/23/18	PAS	Receipt and review of correspondence from the court		
6/05/18	JMS	Telephone conference with Dominic Martin regarding class action status update		
6/05/18	JMS	Correspondence to Dominic Martin regarding the class action status update		
6/05/18	JMS	Correspondence to Derek Chipman regarding class action status update		
6/19/18	JMS	Draft and revise status update to class members		
6/25/18	JMS	Telephone conference with the client regarding status update		
8/01/18	JMS	Telephone conference with the court regarding pending class/collective action motions		
8/01/18	JMS	Telephone conference with the client regarding the pending class/collective action motions		
8/07/18	JMS	Review of pending motions and calendar order as status update to case		
8/07/18	JMS	Telephone conference with the client regarding status update		
8/13/18	JMS	Telephone conference with the client regarding status update		
9/19/18	JMS	Research regarding Judge Black pending decisions on motions		

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9/19/18	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding the pending decisions on motions		
9/21/18	JMS	Correspondence with Sharon J. Sobers x2 regarding Judge Black delays		
9/24/18	JMS	Receipt and review of CJRA report; Correspondence to Peter A. Saba and Sharon J. Sobers regarding CJRA report and outstanding motions to certify/decertify		
9/28/18	JMN	Receipt and review of certification decision; Correspondence with Joshua M. Smith regarding same		
9/28/18	JMS	Receipt and review of court's decision denying motion to decertify and motion to certify		
9/28/18	JMS	Conferences with Peter A. Saba, Jeffrey M. Nye, and Sharon J. Sobers regarding decision and appeal		
9/28/18	JMS	Telephone conference with the client regarding the decision and appeal		
9/28/18	JMS	Legal research regarding Rule 23(f) and appeal		
9/28/18	PAS	Receipt and review of decision of the court		
10/01/18	JMN	Conferences with Joshua M. Smith regarding petition for permission to appeal		
10/01/18	JMN	Telephone conference and correspondence with Pierre Bergeron regarding example briefs of petition for permission to appeal;		
10/01/18	JMS	Review of district court's order denying motion for class certification and denying motion to decertify FLSA collective action		
10/01/18	JMS	Review of case law cited by the court		
10/01/18	JMS	Prepare memo to file regarding upcoming discovery and related tasks to petition for review		
10/01/18	JMS	Correspondence to Peter A. Saba, Sharon J. Sobers, and Jeffrey M. Nye regarding the discovery		
10/01/18	JMS	Prepare outline to petition for review		
10/01/18	PAS	Review of issues relating to certification decision; Conference with Josh M. Smith regarding appeal issues and discovery issues		

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Date	Int	Professional Services	Hours	Amount
10/02/18	JMS	Telephone conference with the client regarding status update; Draft outline to petition for review; Legal research regarding issues related to 23(f) petition for review and wage misclassification cases; Legal research regarding administrative exemption and application to class actions		
10/02/18	JMS	Draft outline to petition for review		
10/02/18	JMS	Legal research regarding issues related to 26(f) petition for review and wage misclassification cases		
10/02/18	JMS	Legal research regarding administrative exemption and application to class actions		
10/03/18	JMN	Research regarding 23(f); Conference with Joshua M. Smith		
10/03/18	JMS	Telephone conference with Sharon J. Sobers regarding legal research issues for rule 23(f) petition for review		
10/03/18	JMS	Legal research regarding administrative exemption		
10/03/18	JMS	Legal research regarding abuse of discretion standard		
10/03/18	JMS	Draft introduction to petition		
10/03/18	JMS	Review of deposition testimony as cross-referenced with court order denying certification		
10/03/18	JMS	Receipt and review of sample petitions for review from Jeffrey M. Nye		
10/03/18	JMS	Conference with Jeffrey M. Nye regarding introduction of petition		
10/03/18	SJS	Read/Review Perry v. Randstad		
10/04/18	JMN	Conferences and research regarding 23(f) brief		
10/04/18	JMS	Draft and revise introduction to petition		
10/04/18	JMS	Correspondence to Jeffrey M. Nye and Sharon J. Sobers regarding the introduction to petition		
10/04/18	JMS	Draft and revise factual background section to petition for review		
10/04/18	JMS	Review of prior briefing on certification		
10/04/18	JMS	Review of deposition transcripts in preparation for drafting factual background of petition		

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10/04/18	JMS	Correspondence to Jeffrey M. Nye and Sharon J. Sobers regarding the deposition transcripts in preparation for drafting factual background of petition		
10/04/18	JMS	Draft correspondence to Opt-In Plaintiffs regarding status update		
10/04/18	KAC	Draft correspondence to class members for Joshua M. Smith and phone conference with Attorney Joshua Smith		
10/04/18	SJS	Review Joshua M. Smith's first paragraph of draft of 23(f) petition, outline thoughts regarding paragraph, direction of brief		
10/04/18	SJS	Review caselaw, Espenscheid, Tyson, parts of O'Brien, type up notes on Perry, Tyson, Espenscheid, read Monroe decision, forward email to Joshua M. Smith regarding caselaw		
10/05/18	JMS	Draft and revise Rule 23(f) petition for review argument section		
10/05/18	JMS	Legal research regarding commonality and wage misclassification		
10/05/18	JMS	Correspondence to Sharon J. Sobers regarding the legal research		
10/05/18	JMS	Draft and revise correspondence to class members regarding status update		
10/05/18	KAC	Complete draft of status update for class action members; Email draft to Joshua M. Smith for review; Cross reference all of Judge Black's citations to deposition testimony for Joshua M. Smith; Meeting with Joshua M. Smith regarding research results		
10/05/18	SJS	Review draft of letter to Opt-Ins regarding Judge Black's decision, review Phipps v. Walmart decision, email Joshua M. Smith regarding changes to letter to Opt-Ins		
10/06/18	JMS	Draft and revise petition for review introduction		
10/06/18	JMS	Legal research regarding administrative exemption		
10/06/18	SJS	Review DeAscencio, Ervin hybrid decisions, review Lindsay decision, email Joshua M. Smith regarding hybrid decisions, relation to Judge Black's decision		
10/08/18	JMS	Draft and revise rule 23(f) petition for review		
10/08/18	JMS	Conference with Jeffrey M. Nye regarding the rule 23(f) petition for review		
10/08/18	JMS	Legal research regarding issues related to certification and commonality		

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10/08/18	JMS	Correspondence to Sharon J. Sobers regarding the issues related to certification and commonality		
10/08/18	JMS	Conference with Peter A. Saba regarding status update Rule 23(f) petition		
10/08/18	SJS	Review Reply Brief in Support of Motion for Class Certification, legal research regarding exercise of independent judgment, draft email to Joshua M. Smith regarding using Perry to show that independent Judgment runs with the task		
10/09/18	JMN	Receipt and review of draft from Joshua M. Smith; Research and revisions regarding same		
10/09/18	JMS	Draft and revise argument section of petition for review		
10/09/18	JMS	Legal research regarding matters of significance and definition under FLSA		
10/09/18	SJS	Review Judge Black Opinion, outline thoughts on exercise of independent judgment depending on nature of task, telephone conference with Joshua M. Smith regarding exercise of independent judgment depending on nature of task, legal research regarding "matters of significance"		
10/09/18	SJS	Revise Joshua M. Smith Introduction to 23(f) briefing		
10/10/18	JMS	Draft and revise petition for review		
10/10/18	JMS	Conference with Sharon J. Sobers x3		
10/10/18	JMS	Conference with Jeffrey M. Nye regarding petition for review		
10/10/18	SJS	Make further revisions to Introductory Paragraph of 23(f) briefing, forward proposed changes to Joshua M. Smith		
10/10/18	SJS	Email Joshua M. Smith regarding Thomas v Speedway decision, email Joshua M. Smith regarding Cameron v. Abercrombie case regarding options vs recommendations, Email Joshua M. Smith attaching legal research on "matters of significance"		
10/10/18	SJS	Review draft of 23(f) petition		
10/11/18	JMS	Correspondence with Sharon J. Sobers regarding petition for review draft and revisions		
10/11/18	JMS	Telephone conference with Peter A. Saba regarding the petition for review draft and revisions		

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Date	Int	Professional Services	Hours	Amount
10/11/18	JMS	Draft and revise petition for review		
10/11/18	JMS	Correspondence with the court regarding scheduling conference		
10/11/18	PAS	Conference with Josh M. Smith regarding issues with scheduling conference and settlement; Receipt and review of correspondence from opposing counsel		
10/11/18	SJS	Draft email regarding suggested revisions to draft 23(f) petition, forward email to Joshua M. Smith		
10/11/18	SJS	Telephone conference with Joshua M. Smith/Bruce Meizlish regarding 23(f) briefing, misclassification cases involving state law in 6th Circuit		
10/11/18	SJS	Review revised draft of 23(f) petition, email Joshua M. Smith regarding petition		
10/12/18	JMS	Draft and revise petition for review		
10/12/18	JMS	Conference with Sharon J. Sobers x3 regarding the petition for review		
10/12/18	JMS	Conference with Peter A. Saba regarding revisions to petition for review		
10/12/18	JMS	Revise petition for review		
10/12/18	JMS	Conference with Karen A. Cittadino regarding petition for review filing		
10/12/18	JMS	Conference with Elizabeth A. Kramer regarding revisions to petition for review		
10/12/18	KAC	Draft and revise Table of Contents and Table of Authorities for Appeal		
10/12/18	KAC	Phone Conferences with the Sixth Circuit United States Court of Appeals regarding filing		
10/12/18	KAC	File Petition for Review with the Sixth Circuit United States Court of Appeals		
10/12/18	KAC	Email opposing counsel the filed documents		
10/12/18	KAC	Upload all documents/emails into firm database		
10/12/18	PAS	Revise and review the appellate brief		
10/12/18	SJS	Review of final draft of 23(f) brief prior to filing, telephone conference with Joshua M. Smith prior to filing 23(f) brief		
10/12/18	SJS	Respond to email from Joshua M. Smith regarding Ahle v. Veracity Research		

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Date	Int	Professional Services	Hours	Amount
10/12/18	SJS	Draft suggested revision of section of brief regarding application of elements of administrative exemption to facts of case, email draft of Joshua M. Smith		
10/15/18	JMS	Correspondence with opposing counsel regarding telephone conference for discovery discussions and upcoming status conference with the court		
10/15/18	SJS	Review law in electronic file regarding willfulness regarding need for further discovery		
10/15/18	SJS	Begin review of Moffett deposition		
10/16/18	JMS	Review of discovery and deficiencies, along with scheduling order in preparation for call with opposing counsel		
10/16/18	JMS	Telephone conference with Sharon J. Sobers regarding the discovery and deficiencies		
10/16/18	JMS	Attend telephone conference with opposing counsel		
10/16/18	JMS	Telephone conference with Sharon J. Sobers regarding the telephone conference with opposing counsel		
10/16/18	SJS	Telephone conference with Joshua M. Smith regarding discovery, settlement procedures prior to status conference with Judge Black		
10/16/18	SJS	Review Amgen, Dukes, Comcast decisions regarding commonality		
10/17/18	JMS	Receipt and review of correspondence from the court regarding status conference		
10/17/18	JMS	Draft motion to stay proceedings		
10/17/18	JMS	Correspondence to opposing counsel regarding the motion to stay proceedings		
10/17/18	JMS	Telephone conference with opposing counsel regarding the motion to stay proceedings		
10/17/18	PAS	Receipt and review of correspondence from the court; Conference with Josh M. Smith regarding issues with motion for stay		
10/18/18	JMS	Prepare for and attend status conference with the court		
10/18/18	JMS	Conference with Peter A. Saba regarding the status conference with the court		
10/18/18	JMS	Conference with Sharon J. Sobers regarding the status conference with the court		

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Date	Int	Professional Services	Hours	Amount
10/18/18	SJS	Telephone conference with Joshua M. Smith regarding Status Conference with Judge Black putting collective action on hold pending Sixth Circuit review of 23(f) petition		
10/22/18	JMS	Receipt and review of sample briefs and decisions regarding 23(f) appeals		
10/22/18	PAS	Receipt and review of correspondence from the court		
10/22/18	SJS	Review 23(f) pleadings provided by Deborah Grayson		
10/23/18	JMN	Receipt and review of brief in opposition to petition for permission to appeal; Correspondence with Joshua M. Smith regarding same		
10/23/18	JMS	Receipt and review of defendant's response in opposition to petition for review		
10/23/18	JMS	Correspondence with Peter A. Saba and Sharon J. Sobers regarding the defendant's response in opposition to petition for review		
10/23/18	KAC	Check Court docket for Attorney Joshua M. Smith		
10/23/18	KAC	Receive and review the Response in Opposition to Plaintiffs' Petition for Permission to Appeal		
10/23/18	KAC	Upload all documents into the firm database		
10/23/18	KAC	Conference with Joshua M. Smith regarding new filing		
10/23/18	KAC	Receive and review multiple emails regarding Response in Opposition and upload all documents into firm database		
10/24/18	JMS	Correspondence with Sharon J. Sobers regarding defendant's response in opposition to plaintiffs' petition for review		
10/24/18	PAS	Receipt and review of correspondence from the court x2		
10/24/18	SJS	Review David Montgomery's 23(f) response, email Joshua M. Smith regarding David Montgomery's 23(f) response		
10/30/18	JMS	Telephone conference with sixth circuit clerk regarding notices of appearance		
10/30/18	JMS	Correspondence to Karen A. Cittadino regarding the notices of appearance		
10/30/18	KAC	Draft Appearance of Counsel for Peter A. Saba		
10/30/18	KAC	Draft Appearance of Counsel for Joshua M. Smith		

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Date	Int	Professional Services	Hours	Amount
10/30/18	KAC	raft Appearance of Counsel for Sharon J. Sobers		
10/30/18	KAC	File Appearance of Counsel documents with the Court of Appeals		
10/30/18	KAC	Send/serve Appearance of Counsel documents to opposing counsel		
10/30/18	KAC	Upload all documents into firm database		
10/30/18	PAS	Telephone conference with 6th Circuit regarding filing of notice of appearance; Receipt and review of correspondence from court x4		
11/05/18	JMS	Telephone conference with the client regarding status update		
11/13/18	JMN	Receipt and review of decision denying permission to appeal; Conference with Joshua M. Smith regarding same		
11/13/18	JMS	Receipt and review of 6th Circuit order denying petition for review		
11/13/18	JMS	Telephone conference with Peter A. Saba regarding the 6th Circuit order denying petition for review		
11/13/18	JMS	Telephone conference with Sharon J. Sobers regarding the 6th Circuit order denying petition for review		
11/13/18	JMS	Telephone conference with the client regarding the 6th Circuit order denying petition for review		
11/13/18	JMS	Draft and revise status update to class action website		
11/13/18	JMS	Draft and revise correspondence to opt-ins regarding status update		
11/13/18	JMS	Conference with Peter A. Saba regarding litigation strategy and next steps		
11/13/18	KAC	Receive and review Order denying Petition for Review from Joshua M. Smith; Upload Order to firm database		
11/13/18	PAS	Conference with Josh M. Smith regarding issues with denial of appellate review and next steps of litigation		
11/13/18	SJS	Legal Research regarding right of opt-in plaintiffs to appeal class action decision if defendant settles with named plaintiffs		
11/13/18	SJS	Read Pettrey, Lusardi decisions		
11/13/18	SJS	Telephone conference with Joshua M. Smith regarding Sixth Circuit denial of 23(f) petition		

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11/14/18	SJS	Legal Research regarding review of McDonald, Clarke v. Baptist Memorial Healthcare decisions regarding intervention to salvage appeal if named Plaintiffs do not appeal, review Sixth Circuit's denial of 23(f) petition		
11/15/18	JMS	Correspondence with opposing counsel regarding follow-up telephone conference and status update to the court		
11/15/18	JMS	Multiple correspondence to opt-ins regarding status update		
11/15/18	JMS	Telephone conference with the client regarding status update		
11/15/18	SJS	Review dissent in Campbell Ewald v. Gomez decision		
11/16/18	JMS	Correspondence with opposing counsel regarding follow-up telephone conference and status update to the court		
11/19/18	JMS	Prepare for and attend telephone conference with opposing counsel		
11/19/18	JMS	Telephone conference with the court regarding status update		
11/19/18	JMS	Draft letter to opposing counsel regarding outstanding discovery issues		
11/19/18	PAS	Conference with Josh M. Smith regarding outstanding issues		
11/19/18	PAS	Conference call with opposing counsel regarding issues with discovery, trial scheduling and settlement		
11/19/18	PAS	Receipt and review of correspondence from the court		
11/21/18	KAC	Begin preparing status letter to all of the opt-ins for Joshua M. Smith		
11/24/18	SJS	Legal research whether settling Plaintiffs have a right to appeal denial of class certification, what notice do potential class members need regarding denial of certification		
11/26/18	JMS	Telephone conference with Talia Robbins regarding intervening in lawsuit, claims, etc.		
11/26/18	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding the intervening in lawsuit, claims, etc.		
11/27/18	JMS	Telephone conference with Talia Robbins regarding potential claims and intervention		
11/27/18	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding the potential claims and intervention		
11/27/18	JMS	Legal research regarding intervention under Rule 24		

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11/27/18	JMS	Revise correspondence to opt-in plaintiffs		
11/27/18	JMS	Conference with Karen A. Cittadino regarding the potential claims and intervention		
11/27/18	JMS	Revise correspondence to opposing counsel regarding outstanding discovery		
11/27/18	JMS	Correspondence to Peter A. Saba regarding the outstanding discovery		
11/27/18	KAC	Complete letters to opt ins regarding status update		
11/27/18	SJS	Draft Memo to Joshua M. Smith regarding Clarke v. Baptist Memorial Healthcare cases, intervention of opt-ins to serve as named plaintiffs, legal research regarding standards generically for intervention, Kirsch decision		
11/28/18	JMS	Legal research regarding intervention in action following denial of certification		
11/28/18	JMS	Correspondence with Sharon J. Sobers regarding intervention/consolidation of additional plaintiffs		
11/28/18	JMS	Conference with Talia Robbins regarding intervention into case		
11/28/18	KAC	Send out correspondence via email and ordinary mail to all opt ins		
11/28/18	KAC	Create log of opt in individuals to keep track of responses to letter		
11/28/18	SJS	Legal research regarding jurisdiction over Talia Robbins' claim, can she intervene or file separately and consolidate		
11/29/18	SJS	Legal research regarding class actions and motions to intervene		
11/30/18	SJS	Legal Research regarding Robbins intervention, China Agritech decision		
12/01/18	SJS	Legal Research regarding intervention and filing late consents, email Joshua M. Smith regarding intervention and filing late consents		
12/04/18	JMS	Receipt and review of fee agreement and related documents from Talia Robbins; Receipt and review of correspondence from potential class member regarding lawsuit		
12/04/18	JMS	Receipt and review of correspondence from Deni Arce regarding lawsuit		
12/05/18	JMS	Review of documents in preparation for discovery deficiency letter		
12/05/18	JMS	Telephone conference with Sharon J. Sobers regarding discovery and related issues		

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12/06/18	JMS	Correspondence with the court regarding status conference		
12/06/18	JMS	Conference with Peter A. Saba regarding the status conference		
12/06/18	JMS	Telephone conference with Sharon J. Sobers regarding FLSA and late consent filings		
12/06/18	JMS	Receipt and review of case law from Sharon J. Sobers regarding the FLSA and late consent filings		
12/06/18	SJS	Legal Research and email to Josh M. Smith regarding additional cases on filing late consents, especially consents filed late in the litigation		
12/07/18	JMS	Prepare for and attend status conference with the court; Correspondence to Peter A. Saba and Sharon J. Sobers regarding status update; Correspondence with potential class member regarding claims		
12/07/18	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding status update		
12/07/18	JMS	Correspondence with Deni Arce regarding claims		
12/07/18	SJS	Telephone conference with Joshua M. Smith regarding status conference with the Court following rejection of 23(f) petition		
12/11/18	SJS	Review facts in Defendant's Memo in Opposition to Class Certification (in preparation for preparing outline for summary judgment motion)		
12/12/18	JMS	Receipt and review of correspondence from Talia Robbins regarding signed contingency fee agreement		
12/12/18	JMS	Correspondence to Karen A. Cittadino regarding the signed contingency fee agreement		
12/13/18	SJS	Continue review of facts in Defendant's briefing, draft initial outline for summary judgment motion		
12/14/18	SJS	Continue review of facts in Defendant's Motion to Decertify Class, Motion in Opposition to Class Certification, add to Outline		
12/19/18	JMS	Receipt and review of correspondence from potential class member regarding follow-up inquiries on representation		
12/20/18	SJS	Review/revise/type Outline for summary judgment motion, with/without added facts		

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Date	Int	Professional Services	Hours	Amount
12/26/18	SJS	Review Defendant's Reply in Support of Motion To Decertify Collective Action, add citations to record testimony in Reply supporting Defendant's position to outline of summary judgment motion, email Draft Outline of Summary Judgment Motion to Joshua M. Smith, Esq.		
12/31/18	JMS	Review correspondence and legal research memo from Sharon J. Sobers regarding motion for summary judgment and administrative exemption		
1/02/19	JMS	Receipt and review of calendar order from the court		
1/02/19	JMS	Correspondence to Karen A. Cittadino regarding the calendar order from the court		
1/04/19	JMN	Conference with Joshua M. Smith regarding jury instructions		
1/04/19	JMS	Review of summary judgment memo and outline from Sharon J. Sobers in preparation for summary judgment briefing		
1/04/19	JMS	Review of sample jury instructions		
1/04/19	JMS	Draft and revise jury instructions for FLSA collective action		
1/04/19	KAC	Draft correspondence to update class members on status of case		
1/07/19	JMS	Receipt and review of Kroger's responses and objections to third set of discovery requests		
1/07/19	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding the Kroger's responses and objections to third set of discovery requests		
1/07/19	JMS	Receipt and review of signed fee agreement from Talia Robbins		
1/07/19	JMS	Correspondence to Karen A. Cittadino regarding the signed fee agreement from Talia Robbins		
1/07/19	PAS	Conference with Jeffrey M. Nye regarding documents due for discovery and additional sources for jury instructions		
1/08/19	JMS	Draft and revise motion for summary judgment		
1/08/19	JMS	;Review of legal research memo from Sharon J. Sobers regarding the motion for summary judgment		
1/08/19	JMS	Receipt and review of voicemail from Dominic Martin (opt in)		
1/09/19	JMS	Receipt and review of defendant's responses to third set of discovery requests		

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1/09/19	JMS	Correspondence to Peter A. Saba and Sharon J. Sobers regarding Kroger responses to discovery and document production		
1/09/19	JMS	Correspondence with Jeffrey M. Nye regarding the Kroger responses to discovery and document production		
1/09/19	JMS	Legal research regarding collective action trials and jury instructions		
1/09/19	JMS	Draft potential jury instructions		
1/10/19	JMS	Draft and revise factual background section of motion for summary judgment		
1/10/19	JMS	Revise potential jury instructions for FLSA collective action trial		
1/11/19	JMS	Draft and revise motion for summary judgment		
1/11/19	JMS	Correspondence to Sharon J. Sobers regarding the motion for summary judgment		
1/14/19	JMS	Revise proposed jury instructions		
1/15/19	JMS	Receipt and review of correspondence from Sharon J. Sobers regarding motion for summary judgment and administrative exemption		
1/15/19	JMS	Draft and revise argument section of motion for summary judgment		
1/15/19	SJS	Review Joshua M. Smith's Outline for FLSA Motion for Summary Judgment, email redline of Summary Judgment Outline to Joshua M. Smith, include comments on Novartis decision and 10 point CFR regulation standard for "independent judgment on matters of significance" analysis		
1/16/19	JMS	Conference with Sharon J. Sobers regarding draft motion for summary judgment and issues		
1/16/19	SJS	Conference in office with Joshua M. Smith regarding Hardesty Motion for Summary Judgment to assign tasks		
1/17/19	SJS	Review initial draft of Joshua M. Smith FLSA Motion for Summary Judgment		
1/18/19	JMS	Correspondence with Sharon J. Sobers regarding motion for summary judgment and issues related to discretion and independent judgment		
1/18/19	JMS	Draft and revise argument section of motion for summary judgment regarding matters of significance		

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Date	Int	Professional Services	Hours	Amount
1/19/19	JMS	Draft and revise proposed jury instructions for FLSA collective action trial		
1/19/19	SJS	Finish reading Joshua M. Smith draft of Motion for Summary Judgment		
1/21/19	JMS	Draft and revise motion for summary judgment		
1/22/19	SJS	Draft comments regarding Joshua M. Smith draft of Motion for Summary Judgment.		
1/23/19	JMS	Receipt and review of legal research memo from Sharon J. Sobers regarding motion for summary judgment		
1/23/19	SJS	Email comments to Joshua M. Smith regarding draft of Motion for Summary Judgment		
1/29/19	SJS	Review caselaw in Administrative Exemption Folder, prepare a draft email of useful cases for Joshua M. Smith, e.g. examples where there is an exercise of "independent judgment" and where there is no "independent judgment"		
1/30/19	SJS	Legal research regarding wording in archived regulation regarding "matters of significance," email Joshua M. Smith regarding same, legal research regarding cases discussing list of factors for analyzing "independent judgment" in 29 CFR 541.202(b)		
1/31/19	SJS	Legal Research regarding review of two additional cases discussing 10 factor analysis of 29 CFR 541.202(b),		
2/01/19	SJS	Legal Research regarding administrative exemption 10 point list, Henry v Quicken Loans		
2/04/19	JMS	Telephone conference with Sharon J. Sobers regarding motion for summary judgment		
2/05/19	JMS	Draft and revise introduction and factual background section of motion for summary judgment		
2/06/19	JMS	Draft and revise argument section of motion for summary judgment		
2/06/19	SJS	Legal Research regarding 10 point list in 29 CFR 541.202(b), review additional cases		
2/07/19	JMS	Telephone conference with Sharon J. Sobers regarding motion for summary judgment and issues related to "matters of significance"		

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2/07/19	SJS	Legal Research: Review Perry decision regarding 10 point analysis, review additional cases regarding same, including Swigert, Wade Trucking		
2/07/19	SJS	Draft Memo regarding 29 CFR 541.202(b) 10 point list		
2/08/19	SJS	Review and revise Memo on 541.202(b), forward to Joshua M. Smith with revised Outline for Legal Section of Motion for Summary Judgment		
2/10/19	JMS	Prepare and revise draft jury instructions in preparation for MSJ and trial prep meeting		
2/10/19	JMS	Prepare and revise draft jury instructions in preparation for MSJ and trial prep meeting		
2/11/19	JMN	Prepare for and attend case status conference regarding motion for summary judgment and trial with Joshua M. Smith, Peter A. Saba, and Sharon J. Sobers		
2/11/19	JMS	Prepare for and attend task list meeting regarding motion for summary judgment and scheduled trial		
2/11/19	JMS	Conference with Sharon J. Sobers regarding revisions to motion for summary judgment		
2/11/19	JMS	Legal research regarding administrative exemption and outside circuit case law		
2/11/19	JMS	Revise introduction to motion for summary judgment		
2/11/19	JMS	Review of Rana Schiff deposition transcript		
2/11/19	PAS	Conference with Josh M. Smith, Jeffrey M. Nye and Sharon J. Sobers regarding all issues relating to MSJ and trial preparation		
2/11/19	SJS	Conference in office with Peter A. Saba, Joshua M. Smith, and Jeffrey M. Nye regarding next steps in FLSA class action		
2/11/19	SJS	Review Factual Allegations section of Joshua M. Smith's draft of Motion for Summary Judgment		
2/12/19	JMS	Review of Sharon J. Sobers revisions to factual background of motion for summary judgment		
2/12/19	JMS	Revise factual background		

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2/12/19	JMS	Receipt and review of Sharon J. Sobers revisions to legal analysis section of motion for summary judgment		
2/12/19	JMS	Revise analysis section		
2/12/19	JMS	Legal research regarding management and general business operations element of administrative exemption		
2/12/19	JMS	Correspondence with Sharon J. Sobers regarding the management and general business operations element of administrative exemption		
2/12/19	SJS	Prepare redline for Factual Allegations, Summary Judgment Standard sections of Joshua M. Smith's initial draft of Motion for Summary Judgment, forward redline to Joshua M. Smith		
2/12/19	SJS	Prepare redline/comments on the Legal Analysis portion of Joshua M. Smith's initial draft of Plaintiff's Motion for Summary Judgment		
2/13/19	JMS	Receipt and review of Sharon J. Sobers memo regarding Perry v. Randstad and analysis		
2/13/19	JMS	Revise motion for summary judgment regarding the Perry v. Randstad and analysis		
2/13/19	JMS	Draft and revise introduction, factual background, and arguments sections of motion for summary judgment		
2/13/19	SJS	Email Joshua M. Smith regarding Sixth Circuit law regarding 50% of time should be spent on task for "primary duty" designation to apply		
2/13/19	SJS	Respond to Joshua M. Smith's email regarding Beauford v. ActionLink, send summary of Perry positions on Talent Acquisition Specialist and Staffing Consultant to Joshua M. Smith		
2/13/19	SJS	Prepare task lists for the Plaintiffs in Andrade and Ogden, respond to Joshua M. Smith's second email on Beauford v. ActionLink		
2/14/19	JMS	Draft and revise introduction, factual background, and argument sections of motion for summary judgment		
2/14/19	SJS	Review recruiter cases, forward Sierra decision to Joshua M. Smith		
2/15/19	JMN	Receipt and review of draft motion for summary judgment from Joshua M. Smith		
2/15/19	JMS	Draft and revise argument section of motion for summary judgment		
2/15/19	JMS	Draft combined table of contents and summary of the argument		

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2/15/19	JMS	Review of depositions and related discovery materials in preparation for drafting proposed undisputed facts		
2/15/19	JMS	Draft proposed undisputed facts		
2/15/19	JMS	Telephone conference with Sharon J. Sobers regarding the proposed undisputed facts		
2/15/19	SJS	Telephone conference with Joshua M. Smith regarding revised draft, download revised draft and read it, email Joshua M. Smith regarding two areas to think further about		
2/15/19	SJS	Review Perry decision regarding Court's reasons for sending Staffing Consultant position to the Jury, email Joshua M. Smith regarding various aspects of Perry and a new district court decision in that case		
2/15/19	SJS	Respond to Joshua M. Smith email regarding distinguishing recruiters who are exercising allegedly "best fit" discretion in light of Perry analysis		
2/16/19	JMN	Review of and suggested edits to motion for summary judgment		
2/16/19	JMS	Draft and revise proposed undisputed facts		
2/16/19	SJS	Draft redline of revised legal analysis in Motion for Summary Judgment draft, review Stultz decision, forward Stultz decision to Joshua M. Smith		
2/17/19	JMN	Review of and edits to motion for summary judgment; Correspondence with Joshua M. Smith		
2/17/19	JMS	Correspondence with Jeffrey M. Nye regarding motion for summary judgment and revisions		
2/17/19	JMS	Review of deposition transcripts in preparation for revising proposed undisputed facts and factual background of motion for summary judgment		
2/18/19	JMN	Motion for summary judgment revisions with Joshua M. Smith		
2/18/19	JMS	Correspondence with Sharon J. Sobers regarding organization of motion for summary judgment and revisions		
2/18/19	JMS	Conference with Jeffrey M. Nye regarding revisions to motion for summary judgment		
2/18/19	JMS	Revise factual background and argument sections of motion for summary judgment		

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Date	Int	Professional Services	Hours	Amount
2/18/19	JMS	correspondence with opposing counsel regarding witness list exchange		
2/19/19	JMN	Motion for summary judgment		
2/19/19	JMS	Conference with Jeffrey M. Nye regarding revisions to motion for summary judgment and reorganization		
2/19/19	JMS	Draft revisions to factual background and arguments sections based on Jeffrey M. Nye revisions		
2/19/19	JMS	Telephone conference with Sharon J. Sobers regarding revisions to motion for summary judgment and additional legal research issues		
2/19/19	SJS	Highlight important items in redlined draft, forward redline to Josh M. Smith		
2/19/19	SJS	Review and edit material related to case citations in Matters of Significance section of Motion for Summary Judgment Draft, forward edited section to Joshua M. Smith		
2/19/19	SJS	Telephone conference with Joshua M. Smith regarding status of Motion for Summary Judgment, and regarding adding information on Staffing Consultants to Motion, review and edit materials related to cases on Independent Judgment section of Motion For Summary Judgment draft, forward revised section on independent judgment to Joshua M. Smith		
2/19/19	SJS	Research Evidence Rule permitting introduction of summary evidence, legal research on Representative Evidence, forward Memo on Representative Evidence to Joshua M. Smith		
2/20/19	JMN	Motion for summary judgment revisions		
2/20/19	JMS	Draft revisions to factual background and argument sections of motion for summary judgment		
2/20/19	JMS	Correspondence to Jeffrey M. Nye and Sharon J. Sobers regarding the motion for summary judgment		
2/20/19	JMS	Draft affidavit of counsel with supporting exhibits		
2/20/19	JMS	Draft and revise proposed undisputed facts		
2/20/19	JMS	Correspondence to Jeffrey M. Nye and Sharon J. Sobers regarding the proposed undisputed facts		
2/20/19	JMS	Review of documents produced in discovery for additional evidence in support of motion for summary judgment		

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Date	Int	Professional Services	Hours	Amount
2/20/19	SJS	Review latest draft of brief, forward redline of latest draft to Joshua M. Smith		
2/21/19	JMN	Motion for summary judgment		
2/21/19	JMS	Revise table of contents with summary, introduction, factual background, and argument sections of motion for summary judgment		
2/21/19	JMS	Revise proposed undisputed facts		
2/21/19	JMS	Revise counsel affidavit with supporting exhibits		
2/21/19	JMS	Prepare exhibits for affidavit		
2/21/19	SJS	Review Statement of Undisputed Facts, forward suggestions and redline of Undisputed Facts to Joshua M. Smith		
2/21/19	SJS	Review Joshua M. Smith Affidavit, telephone conference with MIS regarding Archived File for Legal Research on Evidence Rule 1006, move legal research from archived file to Hardesty file, email comments on Affidavit to Joshua M. Smith		
2/21/19	SJS	Legal research regarding 2nd prong of administrative exemption, draft version of second prong argument (long and short versions), forward version of second prong argument to Joshua M. Smith		
2/22/19	JMN	Motion for summary judgment; Conferences and correspondence with Joshua M. Smith		
2/22/19	JMS	Conference with Peter A. Saba regarding revisions to motion for summary judgment		
2/22/19	JMS	Conference with Courtney Williams regarding filing motion for summary judgment and counsel affidavit (under seal)		
2/22/19	JMS	Revise proposed undisputed facts		
2/22/19	JMS	Conference with Sharon J. Sobers regarding the same		
2/22/19	JMS	Draft revisions to motion for summary judgment		
2/22/19	JMS	Telephone conference with opposing counsel regarding exhibits to be filed under seal		
2/22/19	JMS	Telephone conference with the court regarding the same		
2/22/19	JMS	Draft motion for leave to file exhibits under seal		

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Date	Int	Professional Services	Hours	Amount
2/22/19	JMS	Conference with Elizabeth A. Kramer x2 regarding revisions to motion for summary judgment		
2/22/19	PAS	Review and finalize the MSJ; Conference with Josh M. Smith regarding changes to the MSJ; Receipt and review of correspondence from the court x3		
2/25/19	JMS	Conference with Peter A. Saba regarding trial preparation		
2/25/19	JMS	Draft task list memo to Peter A. Saba, Jeffrey M. Nye and Sharon J. Sobers		
2/25/19	JMS	Correspondence with opposing counsel regarding exhibits filed under seal		
2/25/19	PAS	Receipt and review of correspondence from the court		
2/26/19	JMS	Receipt and review of legal research from Jeffrey M. Nye regarding equitable tolling		
2/26/19	JMS	Correspondence to Jeffrey M. Nye regarding the same		
2/26/19	JMS	Correspondence to Talia Robbins regarding status update		
3/01/19	JMN	Conference with Joshua M. Smith regarding witness disclosure		
3/01/19	JMS	Prepare witness disclosure list		
3/01/19	JMS	Correspondence to opposing counsel regarding the witness disclosure list		
3/05/19	HNR	Conference with Peter Saba, Josh Smith, Sharon Sobers, Jeff Nye regarding witnesses, trial preparation		
3/05/19	JMN	Receipt and review of Monroe case from Joshua M. Smith		
3/05/19	JMN	Prepare for and attend conference with Peter A. Saba, Joshua M. Smith, Sharon J. Sobers, and Haley N. Rubel		
3/05/19	JMS	Prepare for and attend conference with Jeffrey M. Nye, Peter A. Saba and Sharon J. Sobers regarding litigation strategy and trial preparation		
3/05/19	JMS	Draft and revise damages questionnaire to opt-in plaintiffs		
3/05/19	JMS	Correspondence with Talia Robbins regarding status update and motion to intervene		

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Date	Int	Professional Services	Hours	Amount
3/05/19	PAS	Conference with Josh M. Smith, Jeffrey M. Nye, Sharon J. Sobers and Haley N. Rubel regarding delegations of duties and issues with witness and evidence charting and trial preparation		
3/05/19	SJS	Prepare for meeting regarding status of class action		
3/05/19	SJS	In office, review Monroe decision, conference with Peter A. Saba, Joshua M. Smith, Jeffrey M. Nye and Haley Rubel regarding status of class action		
3/06/19	HNR	Draft and revise attorney fee log, draft and revise correspondence to opposing counsel regarding attorney fees to date		
3/06/19	JMS	Review of correspondence to opposing counsel regarding attorney's fees		
3/06/19	JMS	Draft revisions to attorney's fees		
3/06/19	JMS	Conference with Haley Rubel regarding opt-in information and deposition testimony		
3/06/19	JMS	Receipt and review of correspondence from Sharon J. Sobers regarding revisions to damages questionnaire to opt-ins		
3/06/19	JMS	Draft and revise the revisions to damages questionnaire to opt-ins		
3/06/19	JMS	Legal research regarding representative testimony and applicability in collective action		
3/06/19	SJS	Review and revise Questionnaire for Opt-Ins regarding damages		
3/07/19	HNR	Create and revise spreadsheet for witnesses		
3/07/19	JMS	Review and revise damages questionnaire		
3/07/19	JMS	Correspondence with Sharon J. Sobers regarding the damages questionnaire		
3/07/19	SJS	Telephone conference with Joshua M. Smith regarding Opt-In Questionnaire regarding damages		
3/08/19	JMS	Draft damages questionnaire to opt-in plaintiffs		
3/08/19	JMS	Correspondence to Sharon J. Sobers regarding the damages questionnaire to opt-in plaintiffs		
3/11/19	HNR	Research witnesses on social media, google, courts and update witness spreadsheet		

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Date	Int	Professional Services	Hours	Amount
3/11/19	JMS	Telephone conference with Sharon J. Sobers regarding damages questionnaires		
3/11/19	JMS	Draft revisions to the damages questionnaires		
3/12/19	HNR	Research witnesses on social media, google, courts and update witness spreadsheet		
3/12/19	JMN	Review recruiter questionnaire; Correspondence with Joshua M. Smith regarding same		
3/12/19	JMS	Draft revisions to damages questionnaire		
3/12/19	JMS	Correspondence to Sharon J. Sobers and Jeffrey M. Nye regarding the same		
3/12/19	JMS	Receipt and review of correspondence from Sharon J. Sobers regarding proposed revisions to damages questionnaire		
3/12/19	SJS	Redraft questions for Opt-In Questionnaire regarding calculation of overtime		
3/13/19	JMS	Correspondence with Jeffrey M. Nye and Peter A. Saba regarding status of motion to intervene		
3/13/19	JMS	Draft revisions to damages questionnaire;		
3/13/19	JMS	Correspondence to Jeffrey M. Nye and Sharon J. Sobers regarding the revisions to damages questionnaire		
3/13/19	SJS	Telephone conference with Joshua M. Smith regarding Opt-In Questionnaire and Jeffrey Nye review of Questionnaire		
3/13/19	SJS	Review Joshua M. Smith's revision of Opt-In Questionnaire regarding calculation of overtime, and forward redline to Joshua M. Smith		
3/14/19	HNR	Review and revise opt-in questionnaire		
3/14/19	HNR	Draft and revise correspondence to opt-ins		
3/14/19	JMS	Revise damages questionnaire		
3/14/19	JMS	Correspondence to Haley Rubel regarding the damages questionnaire		
3/14/19	JMS	Review and revise correspondence to opt-ins regarding damages questionnaire		
3/14/19	JMS	Correspondence to Haley Rubel regarding the damages questionnaire		

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Date	Int	Professional Services	Hours	Amount
3/15/19	HNR	Research witnesses on Lexis and update spreadsheet		
3/15/19	HNR	Create and revise opt-in spreadsheet of contact information		
3/15/19	HNR	Draft and revise correspondence to opt ins; mail correspondence to opt in x27; email correspondence to opt in x27; Create and revise response tracker for opt in questionnaire		
3/15/19	JMS	Correspondence with Haley Rubel x3 regarding damages questionnaire and correspondence to opt-ins		
3/15/19	JMS	Receipt and review of opt-in damages questionnaire responses		
3/15/19	JMS	Draft memo to file regarding the opt-in damages questionnaire responses		
3/15/19	JMS	Draft update to damages calculation for Jalen Johnson		
3/18/19	JMS	Draft update to damages calculation for Jalen Johnson through review of questionnaire responses, work schedule, phone records, and ID badge swipes		
3/19/19	JMS	Revise damages calculation for Jalen Johnson based on questionnaire responses, phone records, work schedules, and badge swipes		
3/20/19	HNR	Research witnesses and update spreadsheet		
3/20/19	JMS	Receipt and review of multiple opt-in responses to damages questionnaire		
3/20/19	JMS	Telephone conference with Sharon J. Sobers regarding the multiple opt-in responses to damages questionnaire		
3/20/19	JMS	Draft update to damages calculation for Jalen Johnson		
3/22/19	HNR	Review opt-in survey responses and enter new contact information in spreadsheet		
3/22/19	HNR	Draft and send correspondence to opt-in Sara Schumann to new address		
3/22/19	HNR	Download new filings from docket and disburse new filings inter-office		
3/22/19	HNR	Prepare and file Supplemental Motion for Leave to File Under Seal and Motion to Extend Conditional Period		
3/22/19	JMS	Receipt and review of defendant's memorandum in opposition to motion for partial summary judgment		
3/22/19	JMS	Telephone conference with Sharon J. Sobers regarding the defendant's memorandum in opposition to motion for partial summary judgment		

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Date	Int	Professional Services	Hours	Amount
3/22/19	JMS	Draft motion to extend conditional period for filing documents under seal		
3/22/19	JMS	Correspondence to Haley Rubel regarding the motion to extend conditional period for filing documents under seal		
3/22/19	PAS	Receipt and review of correspondence from the court x3		
3/22/19	PAS	Conference with Josh M. Smith regarding issues with MOI to MSJ		
3/22/19	SJS	Review Kroger Memo in Opposition to Plaintiffs Motion for Summary Judgment		
3/23/19	JMS	Review of Kroger's memorandum in opposition to motion for summary judgment		
3/23/19	JMS	Draft memo to file regarding points in reply		
3/23/19	JMS	Review of opt-in responses to damages questionnaire		
3/23/19	JMS	; Draft memo to file regarding the opt-in responses to damages questionnaire		
3/25/19	HNR	Review correspondence from opt-in and new opt-in survey responses, enter new contact information into spreadsheet		
3/25/19	JMN	Receipt and review of memorandum in opposition to motion for summary judgment		
3/25/19	JMS	Draft outline of reply in support of motion for summary judgment		
3/25/19	JMS	;Legal research regarding issues related to discretion and independent judgment and definitions;		
3/25/19	JMS	Telephone conference with Sharon J. Sobers regarding points of reply		
3/25/19	JMS	Receipt and review of corrected declaration of Tywana Mathis		
3/25/19	SJS	Draft thoughts on Defendant's Memo in Opposition to Plaintiffs' Motion for Summary Judgment, email thoughts to Joshua M. Smith, review Joshua M. Smith's outline for Proposed Response		
3/26/19	JMS	Review of depositions of Rana Schiff and other managers in preparation for reply in support of motion for summary judgment		
3/26/19	JMS	Draft introduction section to reply in support		
3/26/19	JMS	Review of Kroger's response to proposed undisputed facts and submission of proposed disputed facts		

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Date	Int	Professional Services	Hours	Amount
3/26/19	SJS	Legal Research		
3/26/19	SJS	Email Stultz v. Hunt Transport to Joshua M. Smith		
3/26/19	SJS	Review summary judgment briefing regarding criteria applied to judge applicants for potential hire, type up note regarding same		
3/26/19	SJS	Legal research regarding "all employee's make decisions" and 29 CFR 541.207(d)(1)		
3/27/19	JMS	Draft introduction to reply in support of motion for summary judgment		
3/27/19	JMS	Outline legal arguments		
3/27/19	JMS	Receipt and review of legal research memo from Sharon J. Sobers regarding discretion and independent judgment and legal meaning of same		
3/28/19	HNR	Draft email correspondence to opt-ins regarding questionnaire reminder		
3/28/19	JMS	Draft legal argument sections of reply in support; Correspondence to opposing counsel regarding motion for extension; Review and revise reminder email to opt-ins regarding damages questionnaire		
3/28/19	JMS	Correspondence to opposing counse regarding motion for extension		
3/28/19	JMS	Review and revise reminder email to opt-ins regarding damages questionnaire		
3/28/19	SJS	Email Joshua M. Smith regarding former 29 CFR 541.207, Kroger disconnect on application of administrative exemption to recruiters in collective action certification briefing and Memo In Opposition to Motion for Summary Judgment		
3/29/19	HNR	Send email correspondence to opt-ins regarding questionnaire reminder		
3/29/19	HNR	Draft and revise Motion for Extension of Time and Proposed Entry, correspondence with Josh M. Smith regarding the same, file the same		
3/30/19	SJS	Review last portion of Memo in Opposition to Summary Judgment, rethink outline for Reply		
4/01/19	JMS	Telephone conference with Sharon J. Sobers regarding collective action certification and use of representative testimony		
4/01/19	JMS	Legal research regarding duties "directly and closely related" to exempt work under administrative exemption		

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4/01/19	JMS	Legal research regarding DOL secondary sources including DOL field operations manual		
4/01/19	JMS	Correspondence to Sharon J. Sobers regarding the DOL secondary sources including DOL field operations manual		
4/02/19	HNR	Review and download survey responses and update spreadsheet in preparation for meeting, email correspondence to Josh M. Smith regarding the responses		
4/02/19	JMS	Draft reply in support of motion for summary judgment		
4/02/19	JMS	Telephone conference with Sharon J. Sobers regarding reply in support and legal issues related to representative evidence		
4/02/19	JMS	Conference with Peter A. Saba regarding status of reply in support		
4/02/19	SJS	Telephone conference with Joshua M. Smith regarding appropriateness of citation to DOL operations manual in briefing		
4/02/19	SJS	Finish draft outline of Reply Supporting Summary Judgment, forward Outline to Joshua M. Smith		
4/02/19	SJS	Review Schiff Deposition		
4/02/19	SJS	Respond to Joshua M. Smith email regarding applicability of 6th Circuit Monroe decision to our facts		
4/03/19	HNR	Prepare for and attend meeting with Josh M. Smith, Peter A. Saba, Jeffrey M. Nye, Sharon J. Sobers regarding task list and current status and update to-do list and calendar decided dates following meeting		
4/03/19	JMS	Prepare for and attend trial preparation meeting with Peter A. Saba, Jeffrey M. Nye, Sharon J. Sobers and Haley Rubel		
4/03/19	JMS	Draft reply in support of motion for summary judgment		
4/03/19	JMS	Conference with Sharon J. Sobers regarding trial preparation and witness issues		
4/03/19	PAS	Conference with Josh M. Smith, Sharon J. Sobers and Jeffrey M. Nye regarding review of additional issues for trial in August and completion of the MSJ		
4/03/19	SJS	Review Schiff Deposition		
4/03/19	SJS	In office for status meeting, discussion with Joshua M. Smith		

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Date	Int	Professional Services	Hours	Amount
4/03/19	SJS	Legal research regarding cases Judge Black used to support denying 23(b) class certification, draft memo on cases, forward memo to Joshua M. Smith		
4/04/19	HNR	Correspond with the Court regarding Proposed Order being signed and relay the same to Josh M. Smith		
4/04/19	JMS	Draft and revise reply brief		
4/04/19	SJS	Review cases in Kroger's Memo opposing summary judgment suggesting Plaintiffs were poor performers, draft memo of Joshua M. Smith regarding these cases, forward memo to Joshua M. Smith		
4/04/19	SJS	Review Schiff deposition		
4/04/19	SJS	Telephone conference with Joshua M. Smith regarding draft of reply brief		
4/04/19	SJS	Read portions of Joshua M. Smith's initial draft of Reply Brief supporting summary judgment, send comments on draft to Joshua M. Smith		
4/05/19	HNR	Defense witness research regarding current employment of all disclosed witnesses, Lexis search of all opt-ins and review/save of results		
4/05/19	JMN	Correspondence with Joshua M. Smith regarding reply brief		
4/05/19	JMS	Draft and revise reply brief		
4/05/19	JMS	Correspondence to Jeffrey M. Nye, Peter A. Saba, and Sharon J. Sobers regarding draft reply brief		
4/05/19	SJS	Read remainder of draft of Reply Brief, forward additional comments on draft brief to Joshua M. Smith		
4/08/19	HNR	Receipt and review of new questionnaire responses from opt-ins and update questionnaire tracker and opt-in contact information x2		
4/08/19	HNR	Research opt-ins on social media sites and draft spreadsheet with information from prior interviews and social media site information		
4/08/19	JMN	Revisions to and conferences with Joshua M. Smith regarding reply		
4/08/19	JMS	Correspondence with Talia Robbins regarding affidavit and information		
4/08/19	JMS	Receipt and review of revised draft of reply brief from Sharon J. Sobers		
4/08/19	JMS	Revise reply brief		

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4/08/19	JMS	Legal research regarding matters of significance and ten factor test under code of federal regulations		
4/08/19	JMS	Draft reply in support of motion for summary judgment		
4/08/19	SJS	Draft comments to Joshua M. Smith regarding second draft (first full draft) of Reply Brief		
4/08/19	SJS	Type in redline for remainder of Second Draft of Reply Brief, forward to Joshua M. Smith		
4/08/19	SJS	Review material from Kroger Motion to Decertify incorporated into Memo opposing summary judgment, email Joshua M. Smith regarding significance of incorporated material		
4/08/19	SJS	Telephone conference with Joshua M. Smith regarding memos sent today regarding comments on Reply Brief draft		
4/08/19	SJS	Review Kroger's Memo opposing summary judgment and make list of topics we need to address		
4/09/19	HNR	Locate and review opt-in social media for relevant posts/shares regarding Kroger and review LinkedIn for listed job descriptions		
4/09/19	JMS	Draft and revise reply in support of summary judgment		
4/10/19	HNR	Review opt-in social media for relevant posts/shares regarding Kroger and review LinkedIn for listed job descriptions		
4/10/19	JMN	Edits to reply in support of motion for summary judgment and conference with Joshua M. Smith regarding same		
4/10/19	JMS	Draft and revise reply in support of motion for summary judgment		
4/10/19	JMS	Receipt and review of revisions to reply in support of summary judgment by Jeffrey M. Nye		
4/10/19	JMS	Receipt and review of proposed revisions to reply in support of motion for summary judgment by Sharon J. Sobers		
4/10/19	SJS	Further work on Reply Brief		
4/11/19	HNR	Compile consent form information into spreadsheet of all opt-ins and review questionnaire responses and list missing responses		
4/11/19	JMS	Draft and revise reply in support of motion for summary judgment		
4/11/19	JMS	Conference with Peter A. Saba regarding revisions to reply in support of motion for summary judgment		

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4/11/19	PAS	Review and revise the reply brief; Conference Josh M. Smith regarding changes to the reply brief		
4/12/19	HNR	Revise and finalize formatting of Reply Brief and file the same		
4/12/19	JMN	Finalizing reply with Joshua M. Smith		
4/12/19	JMS	Draft, revise, and finalize reply in support of motion for summary judgment		
4/12/19	JMS	Conference with Peter A. Saba regarding further revisions to reply in support of motion for summary judgment		
4/15/19	JMS	Correspondence with opposing counsel regarding trial procedure and telephone conference		
4/17/19	SJS	Review Judge Black's standing order, email Joshua M. Smith regarding thoughts on status conference with Judge Black		
4/18/19	HNR	Call opt-ins and follow up regarding questionnaire, email opt-ins regarding questionnaire		
4/18/19	JMS	Correspondence with opposing counsel regarding telephone conference to discuss trial procedure		
4/19/19	HNR	Receipt and review of new opt-in questionnaire responses		
4/19/19	JMS	Telephone conference with Sharon J. Sobers regarding trial preparation		
4/22/19	JMS	Correspondence with opposing counsel regarding conference call		
4/22/19	JMS	Prepare for telephone conference with opposing counsel		
4/23/19	JMS	Preparation of jury instructions and potential stipulations		
4/24/19	JMS	Prepare for and attend telephone conference with Peter A. Saba and opposing counsel		
4/24/19	PAS	Conference Josh M. Smith regarding issues; Call with opposing counsel; Conference call with opposing counsel regarding concept of bifurcation		
4/25/19	HNR	Research new numbers for opt-ins with non working telephone numbers		
4/25/19	JMS	Telephone conference with Sharon J. Sobers regarding motion to bifurcate		
4/25/19	JMS	Legal research regarding FLSA claims and bifurcation between liability and damages for purposes of trial		

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Date	Int	Professional Services	Hours	Amount
4/26/19	JMS	Legal research regarding motion to bifurcate		
4/26/19	JMS	Draft motion to bifurcate		
4/29/19	JMS	Draft motion to bifurcate		
4/30/19	HNR	Conference with Josh M. Smith and Sharon J. Sobers regarding trial preparation and trial		
4/30/19	HNR	Conference with Josh M. Smith regarding damages worksheet and calculations		
4/30/19	JMN	Conference with Joshua M. Smith regarding bifurcation motion and status conference		
4/30/19	JMS	Draft motion to bifurcate		
4/30/19	JMS	Conference with Haley N. Rubel and Sharon J. Sobers regarding trial preparation and damages analysis		
4/30/19	JMS	Correspondence with opposing counsel regarding proposal to bifurcate trial		
4/30/19	SJS	Conference in office with Joshua M. Smith/Haley Rubel regarding next steps in collective action		
4/30/19	SJS	Select Questions from Damage Interrogatory Questionnaire for spreadsheet		
5/01/19	HNR	Call opt-ins who have not completed questionnaire and email correspondence to opt-ins who have not completed questionnaire		
5/01/19	JMS	Draft motion to bifurcate; Review of legal research memo from Sharon J. Sobers regarding bifurcation in FLSA context; Correspondence with Sharon J. Sobers regarding the bifurcation in FLSA context		
5/01/19	SJS	Review questions from Questionnaire to select questions for Spreadsheet, draft email regarding questions for Spreadsheets, forward email to Joshua M. Smith and Haley Rubel		
5/01/19	SJS	Legal Research regarding Judge Black cases on bifurcation, draft email to Joshua M. Smith regarding same		
5/02/19	HNR	Draft and revise opt-in damages spreadsheet regarding phone records and schedule		
5/02/19	JMS	Legal research regarding bifurcation		

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5/02/19	JMS	Telephone conference with Sharon J. Sobers regarding motion to bifurcate		
5/02/19	JMS	Conference with Peter A. Saba regarding the motion to bifurcate		
5/02/19	SJS	Legal Research regarding FLSA cases that are bifurcated, telephone conference with Joshua M. Smith regarding bifurcation, read Thompson v Bruister (MD Tenn), legal research regarding bifurcation, draft summary of research regarding bifurcation for Joshua M. Smith, research authority for appointment of special masters, email bifurcation research to Joshua M. Smith		
5/03/19	HNR	Receipt and review of opt-in questionnaire responses		
5/03/19	HNR	Revise damages calculations spreadsheet with schedules		
5/03/19	JMS	Telephone conference with Sharon J. Sobers regarding motion to bifurcate and legal issues		
5/03/19	JMS	Conference with Peter A. Saba regarding the motion to bifurcate and legal issues		
5/03/19	SJS	Additional legal research regarding bifurcation, draft Motion to Bifurcate incorporating portions of Joshua M. Smith draft		
5/05/19	JMS	Legal research regarding bifurcation issues		
5/06/19	HNR	Revise damages calculations spreadsheet with schedules		
5/06/19	JMS	Review and revise motion to bifurcate		
5/07/19	HNR	Draft and revise template letter to opt-ins regarding trial and testifying		
5/07/19	JMS	Review and select documents for trial exhibits		
5/08/19	JMS	Telephone conference with Peter A. Saba regarding motion to bifurcate		
5/08/19	JMS	Correspondence to Jeffrey M. Nye regarding the motion to bifurcate		
5/09/19	HNR	Revise damages calculations with work schedules		
5/09/19	HNR	Draft and revise Affidavit of Josh M. Smith, finalize Motion to Bifurcate with Affidavit and Exhibit and file the same		
5/09/19	JMS	Review affidavit in preparation for motion to bifurcate; Review and revise motion to bifurcate; Correspondence with Courtney M. Wright regarding the motion to bifurcate; Correspondence with Opt-In Marcus LaCour regarding interview and negative reference from CoRE		

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5/09/19	JMS	Review and finalize motion to bifurcate		
5/09/19	JMS	Correspondence with Courtney M. Wright regarding the motion to bifurcate		
5/09/19	JMS	Correspondence with Opt-In Marcus LaCour regarding interview and negative reference from CoRE		
5/09/19	PAS	Review the motion to bifurcate		
5/13/19	HNR	Revise damages calculations spreadsheet with badge swipes		
5/13/19	HNR	Draft and prepare letters to opt-ins regarding trial		
5/13/19	JMS	Receipt and review of correspondence from opt-in Talia Robbins;		
5/13/19	JMS	Correspondence to Haley N. Rubel regarding the correspondence from opt-in Talia Robbins		
5/14/19	HNR	Finalize, prepare and send opt-ins letter regarding trial via ordinary and electronic mail		
5/14/19	JMS	Revise correspondence to opt-ins regarding trial date		
5/14/19	JMS	;Legal research regarding collective action trials and presentation of representative evidence		
5/15/19	HNR	Telephone conference with Sara Schuman regarding updates and questionnaire		
5/15/19	HNR	Call remaining opt-ins regarding questionnaire x6		
5/15/19	JMS	Review and revise jury instructions		
5/15/19	JMS	Review of discovery documents and potential exhibits		
5/16/19	HNR	Revise damages calculations spreadsheet with badge swipes		
5/16/19	JMS	Correspondence with Opt-In Marye Ward regarding trial dates and paid time off		
5/18/19	JMS	Review of discovery documents and potential exhibits in preparation for trial		
5/20/19	HNR	Review deadlines and due dates on Court's docket and rules for trial		
5/20/19	JMS	Review of discovery documents and potential exhibits in preparation for trial		
5/21/19	HNR	Calculate damages based on scheduled hours		

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5/21/19	HNR	Revise damages calculations spreadsheet with badge swipes		
5/21/19	JMS	Review of discovery documents and potential exhibits in preparation for trial		
5/21/19	JMS	Telephone conference with the client regarding status update		
5/22/19	HNR	Revise damages calculations spreadsheet with badge swipes		
5/22/19	JMS	Review of discovery documents and potential exhibits in preparation for trial		
5/22/19	SJS	Draft Stipulations for Trial		
5/22/19	SJS	Review Defendant's Motion for Decertification of FLSA class regarding statements on job duties for recruiters, with respect to whether description is consistent with description of job duties in Defendant's summary judgment briefing, type of Defendant's statements regarding job duties from Reply in Support of Decertification		
5/23/19	HNR	Revise damages calculations spreadsheet with badge swipes		
5/23/19	SJS	Draft update to Joshua M. Smith		
5/23/19	SJS	Review Reply in Support of Decertification, type up relevant information on recruiter job description from Motion to Decertify, review Defendant's Memo Opposing Summary Judgment regarding description of job duties		
5/24/19	SJS	Finish reading Defendant's Memo Opposing Summary Judgment regarding description of job duties, review Plaintiff's Reply in Support of Summary Judgment		
5/25/19	SJS	Type up statements regarding recruiter job duties from Defendant's Memo Opposing Summary Judgment		
5/28/19	SJS	Review Defendant's Memo Opposing 23(b) Class certification and type up statements regarding recruiter job duties		
5/29/19	JMS	Review of discovery documents and potential exhibits in preparation for trial		
5/29/19	JMS	Prepare trial exhibit list		
5/29/19	JMS	;Receipt and review of legal research memo from Sharon J. Sobers regarding defendant's prior statements regarding plaintiffs' job duties		
5/29/19	JMS	Correspondence with Sharon J. Sobers regarding jury instructions		

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5/30/19	HNR	Revise damages calculation spreadsheet with badge swipes		
5/30/19	JMN	Correspondence with Joshua M. Smith regarding Kroger's memorandum in opposition to motion to bifurcate		
5/30/19	JMS	Receipt and review of defendant's memorandum in opposition to motion to bifurcate		
5/30/19	JMS	Correspondence to Peter A. Saba, Sharon J. Sobers, and Jeffrey M. Nye regarding the same		
5/30/19	JMS	Review of discovery documents and potential trial exhibits		
5/30/19	JMS	Draft potential exhibit list in preparation for trial		
5/30/19	JMS	Draft witness list and order of presentation in preparation for trial		
5/30/19	JMS	Correspondence to Sharon J. Sobers regarding the same		
5/30/19	JMS	Legal research regarding damages and prima facie case in preparation for drafting reply in support of bifurcation		
5/30/19	SJS	Legal research regarding what issues juries address in misclassification cases		
5/30/19	SJS	Draft, type up List of Job Duties for real recruiters vs CoRE "recruiters"		
5/31/19	HNR	Revise damages spreadsheet with badge swipes and calculate time for 2 week period		
5/31/19	HNR	Revise and finalize chart to supplement reply to MIO		
5/31/19	HNR	Conference with Josh M. Smith regarding the same		
5/31/19	JMN	Receipt and review of damages spreadsheet; Review Kroger memorandum in opposition to motion to bifurcate		
5/31/19	JMS	Review of damages evidence in preparation for drafting reply in support of motion to bifurcate		
5/31/19	JMS	Draft reply in support of motion to bifurcate		
5/31/19	SJS	Review Defendant's Memo Opposing Motion to Bifurcate, review Chart prepared by Haley Rubel regarding schedules, phone loop records, badge swipes, email Joshua M. Smith regarding representative testimony, possibility of resolving bifurcation issue with agreement to abandon representative testimony in liability phase of trial, Telephone conference with Haley Rubel regarding not receiving emails from court following computer update		

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5/31/19	SJS	Telephone conference with Samuel Schein, Esq. at Marshall & Forman regarding jury instructions, telephone conference with Eric Shear, paralegal, and Peter Krzeski, Esq. at Andy Diller's office regarding jury instructions		
6/03/19	JMS	Review and prepare exhibit list in preparation for trial		
6/03/19	JMS	Conference with Peter A. Saba regarding trial preparation and exhibits		
6/04/19	HNR	Review Judge Black standing order regarding trial		
6/04/19	HNR	Telephone conference with Court regarding position on docket		
6/04/19	HNR	Conference with Josh M. Smith regarding trial dates and deadlines		
6/04/19	HNR	Conference with Josh M. Smith, Peter A. Saba, Jeffrey M. Nye, Sharon J. Sobers regarding trial and preparation		
6/04/19	JMN	Trial prep meeting with Joshua M. Smith, Peter A. Saba, Sharon J. Sobers, and Haley N. Rubel		
6/04/19	JMS	Review and prepare exhibit list for trial		
6/04/19	JMS	Prepare for and attend trial preparation and strategy conference with Peter A. Saba, Jeffrey M. Nye, Sharon J. Sobers, and Haley N. Rubel		
6/04/19	JMS	Review of deposition of Kim Burchett in preparation for trial		
6/04/19	PAS	Conference with Josh M. Smith, Sharon J. Sobers, Jeffrey M. Nye and Haley N. Rubel regarding review of all issues for trial preparation		
6/04/19	SJS	Review materials related to Hardesty Trial prior to Task List Meeting		
6/04/19	SJS	Attend Task List Meeting, conference with Joshua M. Smith following Task List Meeting regarding various issues pertaining to trial		
6/05/19	HNR	Review and collect opt-in information and documents in preparation for trial; Enter into spreadsheet		
6/05/19	JMN	Receipt and review of notes and transcript of Kim Burchett deposition from Joshua M. Smith		
6/05/19	JMS	Conference with Sharon J. Sobers regarding order of witnesses and presentation of case		
6/05/19	JMS	Correspondence with the court x2 regarding status conference		
6/05/19	JMS	Review of deposition of Kim Burchett in preparation for trial		

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6/05/19	JMS	Correspondence to Peter A. Saba and Jeffrey M. Nye regarding the status conference		
6/05/19	PAS	Receipt and review of correspondence from the court x2		
6/05/19	PAS	Conference with Josh M. Smith regarding issues with rescheduling of trial		
6/05/19	SJS	Draft generic direct for recruiter testimony at trial		
6/06/19	HNR	Draft correspondence to opposing counsel regarding attorneys fees, update attorney fees sheet; and send the same to opposing counsel		
6/06/19	JMS	Review and revise correspondence to opposing counsel regarding attorney's fees		
6/06/19	JMS	Telephone conference with Sharon J. Sobers regarding motion to bifurcate and reply in support		
6/07/19	JMN	Conference call with court regarding motion for summary judgment and trial setting		
6/07/19	JMS	Review motion to bifurcate and defendant's opposition in preparation for status conference with the court		
6/07/19	JMS	Prepare for and attend status conference with the court		
6/07/19	JMS	Telephone conference with Sharon J. Sobers regarding motion to bifurcate and trial procedure		
6/07/19	JMS	Receipt and review of notation order from the court		
6/07/19	PAS	Conference call with the court regarding issues with rescheduling of trial; Conference Josh M. Smith regarding issues with rescheduling		
6/07/19	SJS	Telephone conference with Joshua M. Smith regarding bifurcation discussion in status conference with Judge Black		
6/10/19	HNR	Draft and revise letter to opt-in's regarding trial date vacated		
6/10/19	JMS	Review and revise correspondence to the opt ins regarding vacating trial date		
6/10/19	JMS	Draft and revise reply in support of motion to bifurcate		
6/10/19	SJS	Telephone conference with Joshua M. Smith regarding whether to move ahead with Reply in Support of Bifurcation in light of status conference discussion		

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6/10/19	SJS	Draft notes for bifurcation Reply Brief for Joshua M. Smith		
6/11/19	HNR	Draft letter to opt-ins regarding trial date changing		
6/11/19	JMS	Draft reply in support of motion to bifurcate		
6/11/19	JMS	Review of call log hours and related documentation establishing overtime hours worked		
6/11/19	JMS	Prepare spreadsheet for reply in support of bifurcation		
6/11/19	JMS	Receipt and review of legal research memo from Sharon J. Sobers regarding case law cited by defendant regarding bifurcation		
6/11/19	SJS	Review cases Defendant cited in its memorandum opposing bifurcation, Update memo to Joshua M. Smith on bifurcation including comments on Defendant's cases, email Memo on bifurcation to Joshua M. Smith		
6/11/19	SJS	Review Knudson decision cited by Defendant in Memo in Opposition to bifurcation, telephone conference with Joshua M. Smith regarding reply in support of bifurcation, email Knudson decision to Joshua M. Smith		
6/11/19	SJS	Email Joshua M. Smith regarding selection of class representatives in 6th Circuit Monroe decision		
6/12/19	HNR	Finalize and send opt-in letters x27 via email and ordinary mail		
6/12/19	HNR	Finalize information in spreadsheet from questionnaire regarding schedule, salary, and outside work		
6/12/19	HNR	Review discovery from opposing counsel for termination/resignation for opt-ins		
6/12/19	JMS	Draft, revise, and finalize reply in support of motion to bifurcate		
6/12/19	JMS	Receipt and review of voicemails from client		
6/13/19	HNR	Finalize Reply in Support of Bifurcation; Prepare Exhibit x5; File Reply and Exhibits		
6/13/19	JMS	Review and revise reply in support of bifurcation		
6/13/19	JMS	Correspondence to Sharon J. Sobers regarding the reply in support of bifurcation		
6/13/19	JMS	Telephone conference with the client regarding status update		
6/13/19	PAS	Receipt and review of correspondence from the court		

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6/13/19	SJS	Review draft of Reply in Support of Bifurcation		
9/03/19	HNR	Draft correspondence to opposing counsel regarding attorney fees, update attorney fee spreadsheet and send the same to opposing counsel		
9/03/19	JMS	Review of correspondence to opposing counsel regarding attorney's fees		
9/03/19	JMS	Correspondence to Haley N. Rubel regarding the attorney's fees		
9/10/19	JMS	Email correspondence to opt-ins regarding status update		
11/05/19	JMS	Telephone conference with the client regarding status update and contact with the court		
11/06/19	HNR	Conference with Josh M. Smith regarding correspondence to opt ins, draft template correspondence to opt ins regarding status update and draft correspondence to opt in x 27		
11/06/19	JMS	Receipt and review of draft status update to collective action members		
11/06/19	JMS	Correspondence with Haley N. Rubel regarding the status update to collective action members		
11/07/19	HNR	Finalize and prepare correspondence to opt ins and send the same via ordinary mail and electronic mail x28		
11/07/19	JMS	Review and revise correspondence to opt-ins regarding status update		
11/21/19	JMS	Telephone conference with the client regarding status update		
12/26/19	HNR	Receipt of correspondence from opt in and revise contact spreadsheet with new information		
1/06/20	JMS	Review of biography and prior decisions from Judge Matthew W. McFarland		
1/06/20	JMS	Draft memo to file regarding the biography and prior decisions from Judge Matthew W. McFarland		
1/07/20	SJS	Review Judge Black Certification decision for class action, review Judge McFarland decision in Cullen, draft Memo to Joshua M. Smith regarding Cullen/class action certification		
1/08/20	JMS	Correspondence with Sharon J. Sobers regarding decisions from Judge McFarland		
1/08/20	JMS	Telephone conference with the client regarding status update and transfer of case to Judge McFarland		

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1/20/20	HNR	Draft correspondence to opt-ins x27 regarding reassigned judge, conference with Josh M. Smith regarding the same and send correspondence via ordinary and electronic mail x27		
1/20/20	JMS	Review of draft correspondence to opt-in plaintiffs regarding status update		
3/20/20	JMS	Telephone conference with the client regarding status update		
4/24/20	JMS	Correspondence with Lindsey T. Bassitt regarding call from individual on Kroger lawsuit		
5/18/20	HNR	Revise attorney fee breakdown, draft correspondence to opposing counsel regarding attorney fees and obtain standing order for Judge McFarland and review the same		
5/18/20	JMS	Conference with Haley N. Rubel regarding attorney's fees report		
5/18/20	JMS	Receipt and review of draft correspondence regarding the same		
5/18/20	JMS	Review of Judge McFarland standing orders		
6/02/20	JMS	Telephone conference with Sharon J. Sobers regarding case status and status update to opt-ins		
6/03/20	JMS	Conference with Haley N. Rubel regarding status update to class and contact information		
6/09/20	JMS	Correspondence with Kroger employee regarding status of lawsuit		
6/15/20	HNR	Draft template correspondence to opt ins regarding update and contact confirmation		
6/16/20	JMS	Telephone conference with the client regarding status update		
6/17/20	JMS	Review and revise correspondence to opt-ins		
6/19/20	HNR	Review questionnaire responses from opt-ins and update contact list with current employment status with Kroger		
6/19/20	JMS	Telephone conference with the client regarding status update and pending motion for summary judgment		
6/22/20	HNR	Research regarding opt-ins current address and contact information, draft and send correspondence to opt ins via ordinary and electronic, email exchange with opt ins regarding updated contact information, revise memo to file regarding the same, telephone conference with opt in regarding update		

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6/22/20	JMS	Conference with Haley N. Rubel regarding correspondence to opt-ins and current employment status		
6/22/20	JMS	Conference with Haley N. Rubel regarding status update to opt-ins		
6/23/20	HNR	Correspondence with opt in x2 regarding updated information and revise memo to file regarding opt in information and employment status		
6/30/20	HNR	Receipt and review of entry granting motion to file under seal, review motion and prior filings and review docket and file for completion of docket documents; Obtain filings from docket		
7/01/20	JMS	Telephone conference with the client regarding status update		
7/06/20	JMS	Telephone conference with the client regarding status update		
7/07/20	HNR	Receipt and review correspondence from opt-in and update contact with new information from opt-in		
7/15/20	JMS	Conference with court regarding status of motion for summary judgment		
7/15/20	JMS	Telephone conference with the client regarding the same		
7/20/20	JMS	Correspondence with Sharon J. Sobers regarding motion for summary judgment and updated case law research		
7/20/20	SJS	Legal research regarding case law developments since summary judgment briefing was filed with respect to the administrative exemption, citations to Perry v Randstad		
7/21/20	JMS	Receipt and review of legal research memo regarding motion for summary judgment and updated case law		
7/21/20	JMS	Correspondence with Sharon J. Sobers regarding the same		
7/21/20	SJS	Legal research regarding new "recruiter" cases since the Motion for Summary Judgment was filed, Memo/Email to Joshua M. Smith regarding new cases since the Motion for Summary Judgment was filed		
8/04/20	JMS	Correspondence with Jeffrey M. Nye regarding pending motion for summary judgment		
8/18/20	HNR	Draft and send correspondence to opt-ins and conference with Josh M. Smith regarding the same		
8/18/20	JMS	Conference with Haley N. Rubel regarding draft correspondence to opt-ins; Receipt and review of the same		

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9/21/20	JMS	Correspondence with opt-in class member Kim Burchett regarding status update		
9/21/20	JMS	Correspondence with Haley N. Rubel regarding the same		
10/21/20	HNR	Draft template correspondence to opt-ins		
12/01/20	JMS	Receipt and review of order denying motion to bifurcate		
12/01/20	JMS	Receipt and review of order denying in part and granting in part motion for summary judgment		
12/01/20	JMS	Conference with Peter A. Saba regarding the same		
12/01/20	JMS	Conference with Sharon J. Sobers regarding the same		
12/01/20	SJS	Telephone conference with Joshua M. Smith regarding Judge McFarland's summary judgment, bifurcation decisions		
12/01/20	SJS	Read Judge McFarland's bifurcation decision, part of summary judgment decision		
12/02/20	JMS	Conference with Peter A. Saba and Sharon J. Sobers regarding summary judgment decision and availability for status conference		
12/02/20	JMS	Correspondence with the court regarding status conference		
12/02/20	PAS	Receipt and review of correspondence from the court regarding proceeding scheduling; Conference with Josh M. Smith regarding scheduling issues; Receipt and review of correspondence from opposing counsel		
12/02/20	SJS	Finish reading Judge McFarland's summary judgment decision, telephone conference with Joshua M. Smith regarding Hardesty decisions and trial		
12/03/20	JMS	Conference with Sharon J. Sobers regarding summary judgment decision and preparation for trial		
12/03/20	JMS	Review of case law relating to collective action trials		
12/03/20	JMS	Review of memo from Sharon J. Sobers regarding trial issues		
1/05/21	JMS	Legal research regarding issues relate to collective action trial		
1/05/21	JMS	Review Sharon J. Sobers memo regarding trial preparation		
1/08/21	SJS	Review Judge McFarland's Standing Orders for Civil Actions		

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1/14/21	JMS	Review of summary judgment order in preparation for status conference and trial preparation		
1/14/21	JMS	Review of memo to file regarding trial preparation and collective action litigation issues		
1/14/21	JMS	Telephone conference with Sharon J. Sobers regarding trial strategy and procedure		
1/18/21	JMS	Conference with Sharon J. Sobers regarding trial preparation and issues relating to presentation of evidence		
1/18/21	JMS	Legal research regarding representative testimony		
1/18/21	JMS	Correspondence to Sharon J. Sobers regarding the same		
1/18/21	JMS	Draft summary of damages spreadsheet		
1/18/21	JMS	Legal research regarding FLSA collective actions and representative evidence		
1/18/21	SJS	Telephone conference with Joshua M. Smith preparing for meeting with Peter A. Saba regarding status conference with Judge McFarland		
1/18/21	SJS	Email Joshua M Smith Trial Task List, List comparing CoRE recruiter tasks with traditional recruiter tasks, beginning of List of points to be made at trial through various trial witnesses		
1/19/21	JMS	Review of discovery documents and client questionnaire responses; Draft and revise summary of damages for each opt-in member		
1/19/21	JMS	Draft and revises summary of damages for each opt-in member		
1/19/21	PAS	Conference with Josh M. Smith and Sharon J. Sobers regarding issues with trial scheduling, witness contact and future presentation of damage evidence		
1/19/21	SJS	Review 6th Circuit Pierce decision, email Joshua M. Smith regarding preparation for status conference with Peter A. Saba		
1/19/21	SJS	Telephone conference with Joshua M. Smith, Peter A. Saba regarding status conference with Judge McFarland		
1/20/21	JMS	Draft damages summary spreadsheet		
1/20/21	JMS	Prepare for and attend status conference with the Court		
1/20/21	JMS	Draft correspondence to opt-ins regarding status update		

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1/20/21	JMS	Conference with Rachael M. Myers regarding the same		
1/20/21	PAS	Prepare for and attend the status conference with the Court		
1/20/21	PAS	Conference with Josh M. Smith regarding contact with opt-ins		
1/20/21	PAS	Receipt and review of correspondence from the Court		
1/20/21	SJS	Telephone conference with Joshua M. Smith following up on Status Conference with Judge McFarland		
1/29/21	JMS	Conference with Courtney M. Wright regarding notices to class members		
1/29/21	JMS	Telephone conference with opt-in plaintiff regarding the same		
2/03/21	JMS	Revise damages summary spreadsheet		
2/03/21	JMS	Review of discovery		
2/03/21	JMS	Telephone conference with the client (Hardesty) regarding hours and calculation		
4/26/21	JMS	Conference with Peter A. Saba and Jessica K. Peterson regarding documents produced and preparation for trial		
4/26/21	JMS	Separate conference with Jessica K. Peterson regarding documents produced and preparation for trial		
4/29/21	JKP	Comparing Bates stamped documents with the Log of Documents Produced.		
4/30/21	JKP	Comparing Bates stamped documents with the Log of Documents Produced.		
5/03/21	JKP	Comparing Bates stamped documents with the Log of Documents Produced.		
5/04/21	JKP	Comparing Bates stamped documents with the Log of Documents Produced.		
5/05/21	JKP	Comparing Bates stamped documents with the Log of Documents Produced.		
5/05/21	JKP	Logging Bates stamped documents into Log of Documents Produced.		
5/06/21	JKP	Logging Bates Stamped Documents into Log of Documents Produced for Hardesty Case		

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Date	Int	Professional Services	Hours	Amount
5/07/21	PAS	Receipt and review of correspondence from the Court regarding rescheduling of trial		
5/12/21	JKP	Drafted a template for letter for plaintiffs		
5/19/21	JMS	Review and revise correspondence to opt-ins regarding status update		
5/28/21	JKP	Informing plaintiffs via mail and email about a status update for the case		
6/11/21	JKP	Logging documents produced by the defendant		
6/15/21	JKP	Logging documents that were produced by the defendant		
6/21/21	JMS	Conference with Jessica K. Peterson regarding damages evidence for trial		
6/21/21	JMS	Review of damages spreadsheet		
6/24/21	JKP	Going through phone records and calculating overtime pay for each plaintiff		
6/24/21	JMS	Receipt and review of revised damages spreadsheet from Jessica K. Peterson		
6/24/21	JMS	Correspondence with Jessica K. Peterson regarding the same		
6/28/21	PAS	Prepare for and attend conference with the Court regarding trial setting; Receipt and review of correspondence from the court		
6/29/21	JMS	Prepare for and attend conference with the court		
6/29/21	JMS	Conference with Jessica K. Peterson regarding damages evidence		
7/01/21	JKP	Creating a spreadsheet to calculate damages from work schedules		
7/06/21	JKP	Calculating damages for Hardesty plaintiffs		
7/07/21	JKP	Calculating damages for the Hardesty plaintiffs		
7/08/21	JKP	Calculating damages for the Hardesty plaintiffs		
7/08/21	JMS	Review of draft correspondence to opt-ins regarding status update		
7/09/21	JKP	Calculating damages for the Hardesty plaintiffs		
7/09/21	JKP	Creating and sending letters regarding an update to the plaintiffs		
7/09/21	JMS	Review and revise correspondence to opt-ins; Correspondence to Jessica K. Peterson regarding the same		
7/12/21	JKP	Calculating damages for the Hardesty plaintiffs		

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Date	Int	Professional Services	Hours	Amount
7/13/21	JKP	Calculating damages for the Hardesty plaintiffs		
7/27/21	JKP	Calculating damages for the Hardesty plaintiffs		
8/10/21	JKP	Calculating damages for Hardesty plaintiffs		
8/11/21	JKP	Calculating damages for Hardesty plaintiffs		
8/11/21	JMS	Receipt and review of recruiter damages spreadsheet; Conference with Jessica K. Peterson regarding the same		
10/04/21	JKP	Logging documents produced by Kroger		
10/12/21	MDS	Review client files		
10/13/21	JKP	Developing profiles for each of the plaintiffs		
10/14/21	JKP	Developing profiles for each of the plaintiffs		
10/15/21	JKP	Developing profiles for each of the plaintiffs		
10/18/21	JKP	Developing profiles for each of the plaintiffs		
10/19/21	JKP	Developing profiles for each of the plaintiffs		
10/21/21	JKP	Developing profiles for each of the plaintiffs		
10/25/21	JKP	Developing profiles for each of the plaintiffs		
10/29/21	JKP	Developing profiles for each of the plaintiffs		
11/01/21	JKP	Developing profiles for each of the plaintiffs		
11/04/21	JKP	Developing profiles for each of the plaintiffs		
11/05/21	JKP	Developing profiles for each of the plaintiffs		
11/08/21	JKP	Developing profiles for each of the plaintiffs		
11/09/21	JKP	Developing profiles for each of the plaintiffs		
11/10/21	JKP	Developing a profile for each of the plaintiffs		
11/11/21	JKP	Developing a profile for each of the plaintiffs		
11/16/21	JKP	Developing profiles for each of the plaintiffs		
11/18/21	MDS	Review class member files regarding class members to use at trial and prepare a list of class members to present at trial		
11/19/21	MDS	Review class member files regarding class members to use at trial and prepare a list of class members to present at trial		

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Date	Int	Professional Services	Hours	Amount
11/22/21	JMS	Legal research regarding FLSA and collective action trial procedures (including damages evidence)		
11/22/21	JMS	Draft memo to file regarding trial		
11/23/21	MDS	Continue to review class member files regarding class members to use at trial and prepare a list of class members to present at trial		
11/24/21	JMS	Review of summary judgment decision		
11/24/21	JMS	Draft and revise order of exhibits for trial		
11/24/21	JMS	Draft and revise trial task list		
11/24/21	MDS	Continue to review class member files regarding class members to use at trial and pPrepare a list of class members to present at trial		
11/29/21	JMS	Review of recruiter profiles created by Jessica K. Peterson		
11/29/21	JMS	Draft recruiter profile page for Joseph Hardesty		
11/29/21	JMS	Conference with Peter A. Saba regarding trial preparation		
11/29/21	JMS	Draft trial preparation memo		
11/29/21	JMS	Correspondence to Jessica K. Peterson, Sharon J. Sobers, and Matthew D. Soaper regarding trial task list meeting and items to be completed		
11/29/21	MDS	Continue to review class members and prepare overview document of each class member		
11/30/21	JMS	Review of discovery documents		
11/30/21	JMS	Legal research regarding evidentiary objections in FLSA litigation		
11/30/21	JMS	Review of court trial docket		
11/30/21	JMS	Draft memo to file regarding motions in limine		
11/30/21	JMS	Conference with Matthew D. Soaper regarding class members and testimony		
11/30/21	MDS	Continue to prepare overview of each class member		
12/01/21	MDS	Prepare a letter to opt-in members regarding trial dates and upcoming steps		
12/01/21	MDS	Prepare draft jury instructions		
12/02/21	MDS	Prepare evidence chart and stipulations		

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12/02/21	MDS	Continue to prepare jury instructions		
12/03/21	JMS	Prepare for and attend telephone conference with Sharon J. Sobers and Matthew D. Soaper regarding trial preparation		
12/03/21	MDS	Planning meeting with Josh M. Smith and Sharon J. Sobers		
12/03/21	MDS	Continue to prepare jury instructions		
12/03/21	MDS	Continue to prepare evidence chart		
12/03/21	MDS	Continue to prepare stipulations to exhibits		
12/03/21	MDS	Continue to prepare stipulations to facts		
12/03/21	MDS	Continue to prepare update letter to opt-in class members		
12/06/21	JMS	Review and revise correspondence to class members regarding trial; Correspondence to Matthew D. Soaper regarding the same		
12/06/21	JMS	Legal research regarding FLSA collective action and representative evidence decisions		
12/07/21	JMS	Revise correspondence to class members; Correspondence to Sharon J. Sobers, Matthew D. Soaper, and Jessica K. Peterson regarding the same		
12/07/21	JMS	Draft evidence chart for purposes of trial		
12/07/21	JMS	Conference with Matthew D. Soaper regarding survey responses and hearsay objection		
12/07/21	MDS	Continue to prepare jury instructions		
12/07/21	SJS	Review letter to class		
12/08/21	JKP	Compiling a spreadsheet of the plaintiffs and most up to date contact information		
12/08/21	JMS	Draft evidence chart for purposes of trial		
12/08/21	JMS	Review of discovery documents in preparation for trial		
12/08/21	MDS	Continue to conduct legal research on the ability to introduce employment surveys into evidence		
12/08/21	MDS	Review discovery documents regarding employment surveys		
12/08/21	MDS	Prepare a legal memorandum on hearsay regarding employment surveys		
12/08/21	SJS	Second Review of letter to class, forward comments to Joshua M. Smith		

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12/08/21	SJS	Move Jury Instructions from other cases to the Hardesty electronic file, begin review of Instructions		
12/09/21	MDS	Conduct legal research on the ability to use demonstrative exhibits		
12/09/21	MDS	Conduct legal research on the ability to introduce employment surveys in to evidence		
12/09/21	MDS	Review discovery documents regarding employment surveys		
12/09/21	SJS	Review 6th Circuit Monroe decision, Matthew D. Soaper's Initial Draft of Hardesty Jury Instructions.		
12/10/21	JMS	Receipt and review of legal research memo from Matthew D. Soaper regarding hearsay evidence; Correspondence with Matthew D. Soaper regarding the same; Legal research regarding Rule 801 (hearsay)		
12/10/21	MDS	Continue to prepare jury instructions		
12/10/21	MDS	Meet with Sharon J. Sobers to discuss jury instructions		
12/10/21	MDS	Continue to conduct legal research on hearsay exceptions regarding anonymous surveys		
12/10/21	MDS	Continue to prepare a summary of research		
12/10/21	SJS	Conference with Matthew D. Soaper regarding initial draft of Jury Instructions		
12/11/21	SJS	Review US Supreme Court Tyson decision		
12/13/21	JMS	Review of discovery documents, and notes to file in preparing trial evidence chart		
12/13/21	JMS	Conference with Sharon J. Sobers regarding damages presentation and evidence		
12/13/21	JMS	Draft memo to file regarding the same		
12/13/21	JMS	Draft updated damages calculation		
12/13/21	MDS	Continue research hearsay regarding anonymous employee surveys		
12/13/21	SJS	Review Tyson dissent by Justice Thomas		
12/13/21	SJS	Draft, review & revise Memo regarding damage jury instructions, forward Memo to Joshua M. Smith, Matthew D. Soaper		
12/14/21	MDS	Continue research hearsay regarding anonymous employee surveys		

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12/14/21	MDS	Conversation with Josh M. Smith regarding jury instructions and plan to present commonality arguments to the jury		
12/14/21	SJS	Telephone conference with Joshua M. Smith regarding damage calculations showing liability for damages, actual calculation		
12/15/21	MDS	Continue research hearsay regarding anonymous employee surveys;x		
12/15/21	MDS	Continue to prepare jury instructions		
12/16/21	JKP	Editing and formatting correspondence for the class members		
12/16/21	JKP	Organizing and categorizing photographs of the Kroger call center in the file		
12/16/21	JMS	Prepare for and attend trial task list meeting with Matthew D. Soaper and Sharon J. Sobers		
12/16/21	JMS	Conference with Jessica K. Peterson regarding inspection photographs; Review of the same for purposes of trial		
12/16/21	JMS	Review of discovery documents and materials		
12/16/21	JMS	Draft and organize evidentiary list/spreadsheet for purposes of trial		
12/16/21	MDS	Continue research hearsay regarding anonymous employee surveys		
12/16/21	MDS	Continue to prepare jury instructions		
12/16/21	MDS	Meeting with Josh M. Smith and Sharon J. Sobers regarding trial preparation		
12/17/21	JKP	Organizing respective binders and exhibits for trial		
12/17/21	JKP	Sending out individualized correspondences to each of the class members		
12/18/21	SJS	Forward sample Pretrial Statements to Matthew D. Soaper		
12/20/21	MDS	Continue to prepare jury instructions		
12/21/21	JMS	Review of documents produced in discovery to revise evidence/exhibit spreadsheet in preparation for trial		
12/21/21	MDS	Continue to prepare jury instructions		
12/22/21	MDS	Continue to prepare jury instructions		
12/27/21	SJS	Legal Research regarding FLSA misclassification cases that have gone to trial, review Henry v. Quicken Loans		

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12/28/21	SJS	Legal research review Hendricks v TQL Logistics, Morgan v Dollar General		
12/29/21	MDS	Continue to prepare jury instructions		
12/30/21	MDS	Continue to prepare jury instructions		
12/30/21	MDS	Prepare pretrial order		
12/30/21	SJS	Respond to email from Matthew D. Soaper regarding new draft of Jury Instructions including information regarding misclassification cases that may have jury instructions, review draft of jury instructions		
12/31/21	MDS	Continue to prepare jury instructions		
12/31/21	MDS	Planning meeting with Sharon J. Sobers		
12/31/21	MDS	Conduct legal research on jury instructions regarding similar issues		
12/31/21	SJS	Telephone conference with Matthew D. Soaper regarding latest draft of Jury Instructions		
1/06/22	MDS	Continue to prepare jury instructions		
1/06/22	MDS	Prepare pretrial order		
1/06/22	SJS	Review current draft of jury instructions from Matthew D. Soaper		
1/07/22	JMS	Correspondence with Matthew D. Soaper and Sharon J. Sobers regarding trial preparation and task list meeting		
1/07/22	JMS	Receipt and review of jury instructions		
1/07/22	MDS	Continue to prepare pretrial order		
1/07/22	MDS	Review changes to jury instructions		
1/07/22	SJS	Email thoughts on current state of jury instructions to Matthew D. Soaper		
1/07/22	SJS	Read Plaintiff's Motion for Summary Judgment regarding law that needs to be considered for jury instructions		
1/08/22	SJS	Review Defendant's Memorandum Opposing Summary Judgment for law relevant to jury instructions		
1/10/22	JKP	Contacting class members and scheduling times for them to speak with Josh M. Smith		

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1/10/22	JMS	Prepare for and attend trial task list meeting with Matthew D. Soaper, Sharon J. Sobers, and Jessica K. Peterson		
1/10/22	JMS	Legal research regarding jury instructions and representative evidence; Review of draft jury instructions		
1/10/22	MDS	Continue to prepare pretrial order		
1/10/22	MDS	Planning meeting with Sharon J. Sobers and Josh M. Smith		
1/10/22	SJS	Review Plaintiffs' Reply Memorandum in Support of Plaintiffs' Motion for Summary Judgment reviewing law for jury instructions		
1/10/22	SJS	Email Joshua M. Smith regarding questions for interviews with opt-ins regarding recruiter tasks		
1/10/22	SJS	Telephone conference with Joshua M. Smith, Matthew D. Soaper, and Jessica K. Peterson, regarding jury instructions, interviews with opt-ins, and preparation of Joint Pretrial Statement		
1/11/22	JMS	Prepare for and attend phone consultation with Rhondalyn West		
1/11/22	MDS	Continue to prepare pretrial order		
1/11/22	MDS	Prepare for a phone screen with Rondalyn West		
1/11/22	MDS	Phone screen with Rondalyn West		
1/11/22	MDS	Review Judge McFarland's standing orders in preparation for trial requirements		
1/11/22	MDS	Review Judge McFarland's standing orders in preparation for trial requirements		
1/11/22	SJS	Review Judge McFarland Decision regarding Summary Judgment for law useful for preparation of jury instructions		
1/12/22	JMS	Prepare for and attend trial preparation call with Kimberly Burchett		
1/12/22	JMS	Prepare for and attend trial preparation call with Jacob Cress		
1/12/22	JMS	Conference with Matthew D. Soaper regarding the same		
1/12/22	JMS	Draft memorandum to file regarding the same		
1/12/22	MDS	Prepare for a phone screen with Jacob Cress and Kimberly Burchett		
1/12/22	MDS	Review Kimberly Burchett deposition		
1/12/22	MDS	Phone Screen with Kimberly Burchett		

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1/12/22	MDS	Phone screen with Jacob Cress		
1/12/22	MDS	Prepare and save notes from phone screens		
1/12/22	MDS	Continue to prepare jury instructions		
1/12/22	SJS	Start revision of draft of jury instructions related to administrative exemption		
1/13/22	JKP	Logging documents produced in discovery		
1/13/22	JMS	Review of jury instructions; Correspondence with Sharon J. Sobers regarding the same		
1/13/22	JMS	Prepare for and attend telephone conference with opt-in plaintiff Matt Taske; Conference with Matthew D. Soaper regarding the same		
1/13/22	JMS	Telephone conference with Sharon J. Sobers regarding status update and witness interviews for trial, and jury instructions		
1/13/22	MDS	Prepare for a phone screen with Matt Taske; Review Matt Taske deposition; Phone Screen with Matt Taske; Annotate and organize notes from phone screen; Continue to review Kimberly Burchett deposition; Continue to annotate and organize Kim Burchett and Jacob Cress notes		
1/13/22	MDS	Annotate and organize notes from phone screen		
1/13/22	MDS	Continue to review Kimberly Burchett deposition		
1/13/22	MDS	Continue to annotate and organize Kim Burchett and Jacob Cress notes		
1/13/22	SJS	Review/revise section of Jury Instructions dealing with Administrative Exemption		
1/13/22	SJS	Telephone conference with Joshua M. Smith regarding conversations with recruiters, records of recruiter time in the CoRE phone system		
1/14/22	JMS	Correspondence to opposing counsel regarding final pretrial order and upcoming trial matters; Conference with Sharon J. Sobers and Matthew D. Soaper regarding the same		
1/14/22	JMS	Review of discovery documents		
1/14/22	JMS	Prepare draft potential exhibit list		
1/14/22	MDS	Continue to prepare jury instructions and Pretrial order		

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1/14/22	SJS	Review parts of Foster v Nationwide 6th Circuit decision regarding the Management or General Business Operations prong of the Administrative Exemption for law related to that element in the jury instructions		
1/16/22	JMS	Review of deposition of Joe Hardesty in preparation for trial		
1/16/22	JMS	Review of deposition of Madeline Hickey in preparation for trial		
1/16/22	JMS	Draft trial outline		
1/17/22	JKP	Calling plaintiffs to schedule a time to meet with Josh M. Smith and Matthew D. Soaper		
1/17/22	JMS	Prepare for and attend telephone consultation with Joe Hardesty in preparation for trial; Prepare for and attend telephone consultation with Amanda Gayhart for same purpose		
1/17/22	MDS	Prepare for a phone screen with Joe Hardesty and Amanda Gayhart		
1/17/22	MDS	Review Joe Hardesty deposition		
1/17/22	MDS	Phone Screen with Joe Hardesty		
1/17/22	MDS	Phone screen with Amanda Gayhart		
1/17/22	MDS	Annotate and organize notes from a phone screen		
1/17/22	SJS	Draft Management & General Business Operations Jury Instruction		
1/18/22	JMS	Conference with Matthew D. Soaper regarding recap of class member calls (2pm, 3pm, 4pm)		
1/18/22	JMS	Draft memorandum to file regarding potential trial witnesses, and order of presentation		
1/18/22	MDS	Prepare for a phone screen with Derek Chipman, Lawanna Haskins, and Latasha Moore		
1/18/22	MDS	Review Derek Chipman deposition		
1/18/22	MDS	Phone Screen with Lawanna Haskins		
1/18/22	MDS	Phone screen with Latasha Moore		
1/18/22	MDS	Phone Screen with Derek Chipman		
1/18/22	MDS	Annotate and organize notes from a phone screen		

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1/18/22	SJS	Review/revise administrative exemption jury instructions, forward revision to Matthew D. Soaper		
1/19/22	JMS	Correspondence with Kroger counsel regarding touch base call pre-trial; Conference with Matthew D. Soaper regarding the same		
1/19/22	JMS	Review of documents and potential exhibits in preparation for trial		
1/19/22	JMS	Draft updates to evidence spreadsheet		
1/19/22	JMS	Review of phone records and work schedules in revising damages calculation		
1/19/22	MDS	Continue to annotate notes from phone screen		
1/19/22	MDS	Continue to review depositions of Derek Chipman and Joe Hardesty		
1/19/22	MDS	Continue to prepare jury instructions		
1/19/22	MDS	Prepare and develop meeting agenda with opposing counsel meeting		
1/19/22	SJS	Start looking for other FLSA misclassification cases that might have jury instructions		
1/19/22	SJS	Research cases dealing with fluctuating workweek		
1/20/22	JKP	Sending emails out to plaintiffs to schedule a time to talk to Josh M. Smith		
1/20/22	JMS	Review of discovery documents pertaining to application review process; Correspondence to Sharon J. Sobers regarding the same		
1/20/22	JMS	Receipt and review of research memo from Sharon J. Sobers regarding fluctuating work week and damages calculation		
1/20/22	JMS	Prepare for and attend telephone conference with Marcus LaCour; Draft memorandum to file regarding the same		
1/20/22	JMS	Prepare for and attend telephone conference with Rhonda Furr; Draft memorandum to file regarding the same		
1/20/22	MDS	Continue to review depositions of Kim Burchett		
1/20/22	MDS	Continue to prepare jury instructions		
1/20/22	MDS	Continue to prepare and develop meeting agenda with opposing counsel meeting		
1/20/22	MDS	Prepare for phone interviews with Rhonda Furr and Marcus LaCour		

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1/20/22	MDS	Phone interview with Marcus LaCour		
1/20/22	MDS	Phone Interview with Rhonda Furr		
1/20/22	MDS	Continue to prepare plaintiff trial profiles		
1/20/22	MDS	Prepare and annotate notes from phone interviews		
1/20/22	SJS	Legal Research regarding fluctuating workweek calculation, calculation of hourly rate, meal break calculation, draft memorandum to Joshua M. Smith regarding fluctuating workweek, email Fluctuating workweek memorandum to Joshua M. Smith		
1/21/22	JKP	Logging documents produced in discovery		
1/21/22	JMS	Receipt and review of draft jury instructions from Matthew D. Soaper; Conference with Matthew D. Soaper regarding the same		
1/21/22	JMS	Review of discovery documents to identify potential trial exhibits; Conference with Jessica K. Peterson regarding the same		
1/21/22	MDS	Continue to work on Jury Instructions and Agenda for a meeting with Opposing Counsel		
1/21/22	MDS	Review Courtney Strosnider and Danielle Williams depositions		
1/21/22	MDS	Continue to prepare and annotate notes from interviews with Rhonda Furr and Marcus Lacor		
1/24/22	JMS	Prepare for and attend telephone conference with Jessica Conroy (opt-in); Draft memorandum to file regarding the same		
1/24/22	JMS	Review of deposition of Rana Schiff for purposes of trial; Review of exhibits to deposition; Revise exhibit list		
1/24/22	MDS	Prepare for phone interview with Jessica Conroy; Phone interview with Jessica Conroy		
1/24/22	MDS	Trial preparation meeting with Josh M. Smith		
1/24/22	MDS	Trial preparation phone call with Sharon J. Sobers		
1/24/22	SJS	Revise list of topics for Pretrial Conference with Defendants, telephone conference with Matthew D. Souper regarding Pretrial Conference with Defendants		
1/24/22	SJS	Summarize Schiff deposition		
1/25/22	JKP	Drafting correspondence to non-responsive plaintiffs		

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Date	Int	Professional Services	Hours	Amount
1/25/22	JKP	Logging documents that were produced in discovery		
1/25/22	JMS	Review and revise draft correspondence to opt-in plaintiffs		
1/25/22	JMS	Receipt and review of draft agenda for call with opposing counsel; Conference with Matthew D. Soaper regarding the same		
1/25/22	JMS	Conference with Matthew D. Soaper regarding calls with Madeline Hickey		
1/25/22	MDS	Prepare for phone interview with Madeline Hickey		
1/25/22	MDS	Review Madeline Hickey Deposition		
1/25/22	MDS	Phone interview with Madeline Hickey		
1/25/22	MDS	Continue to prepare meeting agenda with opposing counsel		
1/25/22	MDS	Continue to prepare pretrial order		
1/25/22	SJS	Read Chris Weiler Deposition from Hardesty discrimination litigation, draft email to Joshua M. Smith regarding Weiler deposition, tasks of recruiters discussed in deposition		
1/25/22	SJS	Legal Research - read Cleveland Clinic Foundation case regarding meal breaks		
1/25/22	SJS	Review information in emails from Matthew D. Soaper and Joshua D. Smith regarding topics for Joint Pretrial Statement conference with Defendants and respond		
1/26/22	JKP	Formatting and sending correspondence to non-responsive plaintiffs		
1/26/22	JKP	Logging documents that were produced in discovery		
1/26/22	JMS	Review of phone records and work schedules; Draft damages estimate		
1/26/22	JMS	Draft revisions to agenda for call with opposing counsel		
1/26/22	JMS	Review of draft pretrial order		
1/26/22	JMS	Review of witness list		
1/26/22	JMS	Conference with Matthew D. Soaper regarding revisions to same		
1/26/22	MDS	Prepare for phone interview with Dominic Martin		
1/26/22	MDS	Phone interview with Dominic Martin		
1/26/22	MDS	Review Diana Victoriano deposition		

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Date	Int	Professional Services	Hours	Amount
1/26/22	MDS	Phone meeting to discuss pretrial order and meeting with opposing counsel with Sharon J. Sobers and Josh M. Smith		
1/26/22	MDS	Continue to prepare agenda for meeting with opposing counsel		
1/26/22	MDS	Review potential witness physical locations in preparation for trial		
1/26/22	MDS	Review Judge McFarland's standing orders in preparation for trial		
1/26/22	SJS	Email Joshua M. Smith regarding evidence of damages, damage summary and potential discussion of settlement at Joint Pretrial Statement conference with Defendant's counsel		
1/27/22	JMS	Prepare for and attend telephone conference with opt-in Ckris (Tinashe) Matibiri; Draft memorandum to file regarding the same		
1/27/22	JMS	Revise damages spreadsheet and calculations; Correspondence to Sharon J. Sobers and Matthew D. Soaper regarding the same		
1/27/22	JMS	Prepare for telephone conference with opposing counsel; Revise agenda; Correspondence to opposing counsel regarding the same		
1/27/22	JMS	Receipt and review of legal research from Sharon J. Sobers regarding damages estimates and permissibility at trial		
1/27/22	MDS	Prepare for phone screen with Marye Ward and Ckris Matibiri		
1/27/22	MDS	Phone screen with Ckris Matibiri		
1/27/22	MDS	Phone call with Josh M. Smith discussing damage calculations		
1/27/22	MDS	Review Marye Ward Deposition		
1/27/22	SJS	Review Spreadsheet on schedules, badge swipes, call data, review email from Joshua M. Smith regarding damage summary		
1/27/22	SJS	Review Schiff Deposition		
1/27/22	SJS	Telephone conference with Joshua M. Smith regarding damage calculation		
1/27/22	SJS	Legal research regarding what a "just and reasonable inference" looks like in a presentation of damage calculations		
1/28/22	JKP	Logging documents that were produced in discovery		
1/28/22	JKP	Calculating damages for the plaintiffs		

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Date	Int	Professional Services	Hours	Amount
1/28/22	JMS	Prepare for and attend telephone conference with opposing counsel; Telephone conference with Matthew D. Soaper and Sharon J. Sobers regarding the same		
1/28/22	JMS	Draft revisions to damages calculations		
1/28/22	MDS	Review Daniele Williams transcript		
1/28/22	MDS	Planning meeting with Sharon J. Sobers and Josh M. Smith for meeting with opposing counsel		
1/28/22	MDS	Phone conference with opposing counsel discussing pretrial order with Sharon J. Sobers and Josh M. Smith		
1/28/22	MDS	Review of meeting with opposing counsel with Sharon J. Sobers and Josh M. Smith		
1/28/22	MDS	Conduct research on jury instructions for other similar class-action lawsuits		
1/28/22	SJS	Email Matthew D. Soaper regarding Morgan v. Family Dollar Jury Instructions		
1/28/22	SJS	Telephone conference with Joshua M. Smith, Matthew D. Soaper, David K. Montgomery, Ryan M. Martin regarding the preparation of the Joint Pretrial Statement, telephone conference with Joshua M. Smith and Matthew D. Soaper following conference with opposing counsel		
1/28/22	SJS	Review/summarize Schiff Deposition		
1/29/22	SJS	Review current draft of Joint Pretrial Statement		
1/29/22	SJS	Continue review of Schiff Deposition		
1/31/22	JKP	Logging documents that were produced in discovery		
1/31/22	JMS	Review of correspondence from Sharon J. Sobers regarding Rule 23 class and appealability; Legal research regarding the same; Correspondence to Sharon J. Sobers regarding the same		
1/31/22	MDS	Continue to prepare joint pretrial order		
1/31/22	SJS	Email Matthew D. Soaper regarding makeup of the draft "Uncontroverted Facts" in the Joint Pretrial Statement draft, Email Joshua M. Smith forwarding Memo regarding Intervention for purpose of appealing a denial of 23(b) Class Certification, review ORC 4113.15		

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2/01/22	JMS	Prepare for and attend telephone conference with Wahid Lewis regarding opt-in claims and trial		
2/01/22	MDS	Prepare for and phone interview with Wahid Lewis		
2/01/22	MDS	Continue to prepare pretrial motion		
2/02/22	JKP	Looking through documents produced by Kroger for reference to "scheduling guidelines"		
2/02/22	SJS	Review Pretrial Order draft, including contested, uncontested issues of fact		
2/03/22	JMS	Receipt and review of drafts to pretrial order; Draft revisions to the same		
2/03/22	MDS	Continue to prepare joint pretrial statement		
2/03/22	SJS	Finish summary of Rona Schiff deposition, forward summary to Joshua M. Smith		
2/04/22	JMS	Draft final pretrial order and stipulations; Correspondence to Matthew D. Soaper and Sharon J. Sobers regarding the same; Receipt and review of comments to initial draft		
2/04/22	JMS	Review of deposition of Rana Schiff; Correspondence to Matthew D. Soaper and Sharon J. Sobers regarding the same		
2/04/22	SJS	Review Pretrial Order draft, forward to Joshua M. Smith		
2/04/22	SJS	Legal research regarding Clarke v. Baptist Memorial Hospital, intervention for purposes of appeal		
2/05/22	SJS	Draft Memo to Joshua M. Smith, Matthew D. Soaper regarding prevailing at trial/settlement, legal research regarding "law of the case", forward Memo to Joshua M. Smith, Matthew D. Soaper		
2/07/22	JKP	Looking through documents produced by Kroger for reference to "scheduling guidelines"		
2/07/22	JMS	Draft exhibit list and witness list for purposes of pretrial order; Correspondence to Sharon J. Sobers and Matthew D. Soaper regarding the same		
2/07/22	JMS	Review and revise draft stipulations		

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Date	Int	Professional Services	Hours	Amount
2/07/22	SJS	Telephone conference with Joshua M. Smith regarding the Pretrial Order draft, 23(b) class vs collective and evidence for each, review draft of Pretrial Statement, review uncontested facts, telephone conference with Joshua M. Smith regarding state claims in the Pretrial Order		
2/08/22	JKP	Looking through documents produced by Kroger for reference to "scheduling guidelines"		
2/08/22	JKP	Logging documents that were produced by Kroger		
2/08/22	JMS	Review of discovery documents regarding scheduling guidelines; Correspondence to Sharon J. Sobers regarding the same		
2/08/22	JMS	Draft and revise final pretrial order		
2/08/22	JMS	Draft and revise stipulations; Conference with Sharon J. Sobers and Matthew D. Soaper regarding the same		
2/08/22	JMS	Draft exhibit list		
2/08/22	JMS	Correspondence to opposing counsel regarding draft final pretrial order		
2/08/22	MDS	Analyze defendants declarations in preparation for trial		
2/09/22	JKP	Logging documents that were produced by Kroger		
2/09/22	JMS	Correspondence with opposing counsel regarding final pretrial order; Conference with Sharon J. Sobers and Matthew D. Soaper regarding the same		
2/09/22	JMS	Draft exhibit list based upon review of discovery documents		
2/09/22	MDS	Continue to analyze defendant's declarations		
2/09/22	SJS	Summarize Courtney Strosnider Deposition		
2/10/22	JKP	Locating, compiling, and organizing plaintiff's exhibits		
2/10/22	JMS	Prepare for and attend telephone conference with opt-in Kelly Rutledge; Conference with Matthew D. Soaper regarding the same		
2/10/22	JMS	Review and revise exhibit list		
2/10/22	MDS	Prepare for phone interview with Kelly Rutledge		
2/10/22	MDS	Analyze Kelly Rutledge deposition		
2/10/22	MDS	Phone interview with Kelly Rutledge		
2/10/22	MDS	Trial planning meeting with Sharon J. Sobers and Josh M. Smith		

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2/10/22	MDS	Continue to prepare summaries of non-opt in recruiters declarations		
2/10/22	SJS	Telephone conference with Joshua M Smith, Matthew D. Soaper regarding witness list, witness testimony at trial, recruiter tasks		
2/10/22	SJS	Summarize Strosnider Deposition		
2/11/22	JKP	Locating, compiling, and organizing plaintiff's exhibits		
2/11/22	JKP	Logging documents produced by Kroger		
2/11/22	JMS	Draft witness list for pretrial order; Correspondence to Matthew D. Soaper and Sharon J. Sobers regarding the same		
2/11/22	JMS	Receipt and review of memorandum from Matthew D. Soaper regarding non-opt in recruiters and declaration notes		
2/11/22	MDS	Review witness list		
2/11/22	MDS	Continue to review defendant's declarations		
2/11/22	SJS	Summarize Briana Whitlow Deposition		
2/12/22	JMS	Review of revisions to final pretrial order		
2/12/22	JMS	Correspondence with Sharon J. Sobers and Matthew D. Soaper regarding the same		
2/12/22	JMS	Draft revisions to damages spreadsheet; Review of documents to be included as exhibits for trial		
2/14/22	JMS	Review of documents produced in discovery in preparing exhibit list; Correspondence to Sharon J. Sobers and Matthew D. Soaper x3 regarding the same		
2/14/22	JMS	Review and revise proposed stipulations; Correspondence to Sharon J. Sobers and Matthew D. Soaper regarding the same		
2/14/22	JMS	Draft revisions to proposed pretrial order		
2/14/22	JMS	Telephone conference with opposing counsel regarding revisions to pretrial order		
2/14/22	MDS	Phone call with Sharon J. Sobers and Josh M. Smith discussing pretrial order		
2/14/22	MDS	Phone call with opposing counsel and Josh M. Smith discussing pretrial order		

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2/14/22	MDS	Review pretrial order edits sent by opposing counsel		
2/14/22	MDS	Review witness list sent by opposing counsel		
2/14/22	MDS	Review stipulated facts sent by opposing counsel		
2/14/22	MDS	Review and separate defendants declarations		
2/14/22	PAS	Conference with Josh M. Smith regarding issues with damage stipulation		
2/14/22	SJS	Summarize Briana Whitlow Deposition		
2/14/22	SJS	Telephone conference with Joshua M. Smith and Matthew D. Soaper regarding FLSA trial		
2/15/22	JMS	Review of legal research from Sharon J. Sobers regarding just and reasonable inference; Conference with Sharon J. Sobers regarding the same		
2/15/22	JMS	Review of deposition summary of Briana Whitlow; Correspondence with Sharon J. Sobers regarding the same		
2/15/22	JMS	Review of documents produced in discovery in order to prepare exhibit list		
2/15/22	JMS	Review of Kroger common review guidelines; Conference with Matthew D. Soaper and Sharon J. Sobers regarding the same as it pertains to damages		
2/15/22	JMS	Draft revisions to exhibit list		
2/15/22	MDS	Participate in meeting with Sharon J. Sobers and Josh M. Smith discussing damage calculation		
2/15/22	MDS	Conduct research on damages		
2/15/22	MDS	Continue to prepare jury instructions		
2/15/22	MDS	Review employee handbook for policies regarding overtime		
2/15/22	PAS	Conference with Josh M. Smith regarding issues with damage stipulation		
2/15/22	SJS	Review/Revise Matthew D. Soaper's draft of Plaintiffs' Liability/Damage Jury Instructions, legal research on "just and reasonable inference"		

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2/15/22	SJS	Telephone conference with Joshua M. Smith and Matthew D. Soaper regarding "just & reasonable inference"		
2/15/22	SJS	Telephone conference with Joshua M. Smith regarding Kroger handbook policy regarding overtime in weeks with holiday pay, locate handbook reference in Strosnider deposition		
2/16/22	JKP	Locating, compiling, and organizing plaintiff's exhibits		
2/16/22	JKP	Meeting with Josh M. Smith and Matthew D. Soaper regarding exhibit and exhibit lists		
2/16/22	JKP	Formatting and sending the pretrial order		
2/16/22	JMS	Review and revise exhibit list		
2/16/22	JMS	Review and revise witness list; Correspondence with opposing counsel regarding the same		
2/16/22	JMS	Review of defendant's revised exhibit list		
2/16/22	JMS	Review of defendant's witness list		
2/16/22	JMS	Conference with Jessica K. Peterson regarding submission of proposed final pretrial order		
2/16/22	JMS	Receipt and review of proposed jury instructions; Review of Monroe v. FTS proposed jury instructions; Review of ED Tenn jury instructions example; Conference with Matthew D. Soaper and Sharon J. Sobers regarding jury instructions		
2/16/22	JMS	Review of monroe v. FTS proposed jury instructions		
2/16/22	JMS	Review of ED Tenn jury instructions example		
2/16/22	JMS	Conference with Matthew D. Soaper and Sharon J. Sobers regarding jury instructions		
2/16/22	JMS	Legal research regarding damages evidence at trial		
2/16/22	JMS	Review of Baden-Winterwood; Correspondence with Sharon J. Sobers regarding the same		
2/16/22	MDS	Conduct legal research on prejudgment interest		
2/16/22	MDS	Prepare a spreadsheet of damages regarding salaries, start and end dates, and overtime rates		

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Date	Int	Professional Services	Hours	Amount
2/16/22	MDS	Participate in meeting with Josh M. Smith regarding witness lists and exhibits		
2/16/22	MDS	Prepare and submit updates to exhibit list for trial		
2/16/22	PAS	Conference with Josh M. Smith regarding identification of affirmations at trial and trial exhibits		
2/16/22	PAS	Receipt and review of correspondence from opposing counsel x3 regarding exchange of exhibits		
2/16/22	SJS	Review Baden-Winterwood decision; Review Plaintiffs' Liability Jury Instructions; Email Liability Jury Instructions to Joshua M. Smith; Email comments on Baden-Winterwood decision to Joshua M. Smith		
2/16/22	SJS	Review Plaintiffs' damage Jury Instructions having jurors determine number of overtime hours Plaintiffs worked; Forward Plaintiffs' damage Jury Instructions to Joshua M. Smith		
2/16/22	SJS	Review Exhibit List, email Jury Interrogatories on damages with suggestion for McFarland doing damage calculations		
2/16/22	SJS	Telephone conference with Joshua M. Smith regarding exhibits for data behind summaries		
2/17/22	JKP	Locating, compiling, and organizing defendants' exhibits		
2/17/22	JMS	Draft revisions to summary of facts to be read to jury; Correspondence with Sharon J. Sobers regarding the same		
2/17/22	JMS	Draft revisions to juror interrogatories		
2/17/22	JMS	Correspondence with opposing counsel regarding jury instruction deadline		
2/17/22	JMS	Receipt and review of damages stipulations spreadsheet; Conference with Matthew D. Soaper regarding the same		
2/17/22	JMS	Review and revise jury instructions as to liability; Correspondence to Sharon J. Sobers regarding the same		
2/17/22	MDS	Continue to prepare damage stipulation spreadsheet		
2/17/22	MDS	Review and analyze defendants list of exhibits with regards to possible motions in limine		
2/17/22	MDS	Conduct legal research on 30(b)(6) deposition witnesses at trial		

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2/17/22	SJS	Revise Plaintiffs' Jury Instructions, revise Nature of the Case Instruction, draft Summary of the Case For Beginning of Trial, telephone conference with Joshua M. Smith regarding how to present damages, how to present administrative exemption during opening		
2/17/22	SJS	Email Summary of the Case to Joshua M. Smith, review Joshua M. Smith damage interrogatories, reply to Joshua M. Smith regarding same		
2/17/22	SJS	Telephone conference with Joshua M. Smith regarding damages		
2/17/22	SJS	Shepardize Baden-Winterwood		
2/17/22	SJS	Research US Dept of Labor v. Cole, Takacs decisions		
2/18/22	JKP	Locating, compiling, and organizing plaintiff's exhibits		
2/18/22	JKP	Cross-referencing and compiling a list of joint exhibits for both parties		
2/18/22	JMS	Legal research regarding jury instructions; Review of Henry v. Quicken Loans instructions; Correspondence with Sharon J. Sobers regarding the same		
2/18/22	JMS	Review of joint exhibit list; Correspondence with opposing counsel regarding the same; Conference with Sharon J. Sobers regarding joint exhibits		
2/18/22	JMS	Draft and revise damages stipulations; Correspondence to Matthew D. Soaper and Sharon J. Sobers regarding the same		
2/18/22	JMS	Revise juror interrogatories and verdict form; Correspondence to Sharon J. Sobers regarding the same; Telephone conference with Sharon J. Sobers regarding the same		
2/18/22	MDS	Conduct legal research on jury instructions submitted in similar cases		
2/18/22	MDS	Attend a trial planning meeting with Sharon J. Sobers and Josh M. Smith		
2/18/22	MDS	Continue to prepare jury instructions		
2/18/22	MDS	Continue to review exhibits submitted by opposing counsel for potential motions in limine		
2/18/22	SJS	Exchange emails regarding damage calculation spreadsheet, damage calculation proposals		
2/19/22	JMS	Draft and revise jury instructions; Legal research regarding the same; Correspondence with Matthew D. Soaper and Sharon J. Sobers regarding the same		

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2/19/22	JMS	Legal research regarding Ohio claims and applicability to opt-in plaintiffs; Correspondence to Sharon J. Sobers and Matthew D. Soaper regarding the same		
2/19/22	SJS	Begin summary of Buck Moffett deposition		
2/19/22	SJS	Review Joshua M. Smith draft of Plaintiffs' Liability Jury Instructions, forward Jury Instruction Review to Joshua M. Smith		
2/20/22	JMS	Draft and revise jury instructions		
2/21/22	JKP	Locating, compiling, and organizing plaintiffs' exhibits		
2/21/22	JKP	Filing and serving jury instructions		
2/21/22	JMS	Draft jury instructions; Conferences with co-counsel regarding the same		
2/21/22	MDS	Prepare jury instructions with regards to citations		
2/21/22	MDS	Attend a trial planning meeting with Josh M. Smith and Sharon J. Sobers		
2/21/22	PAS	Receipt and review of correspondence from opposing counsel x2 regarding additional documents located by opposing counsel and jury instructions; Review of opposing counsel jury instructions; Conference with Josh M. Smith regarding issues with the jury instructions; Receipt and review of correspondence from the Court regarding jury instructions		
2/21/22	SJS	Review/revise Liability Jury Instructions; Email revised Instructions to Joshua M. Smith; Review Matthew D. Soaper's revisions to damage instructions		
2/21/22	SJS	Review Pierce decisions		
2/22/22	JKP	Preparing and organizing binders for the pretrial conference		
2/22/22	JKP	Calling plaintiffs and scheduling times to prepare for trial with Josh M. Smith and Matthew D. Soaper		
2/22/22	JMS	Review of exhibits and trial materials in preparation for final pretrial conference; Conference with Peter A. Saba regarding the same		
2/22/22	JMS	Review of defendant's proposed jury instructions; Draft outline of objections to the same; Correspondence with Sharon J. Sobers regarding the same		
2/22/22	JMS	Draft cross-examination of Rana Schiff		
2/22/22	MDS	Conduct legal research on the production of new documents and prepare motion in limine to exclude newly produced documents		

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Date	Int	Professional Services	Hours	Amount
2/22/22	PAS	Conference with Josh M. Smith regarding review of all pre-trial issues; Outline of all questions for voir dire and theme of litigation		
2/22/22	SJS	Quick Preview of Matthew D. Soaper's Motion in Limine regarding Kroger's recently produced documents		
2/22/22	SJS	Draft Plaintiffs' Responses to Defendant's Jury Instructions not requiring legal research		
2/22/22	SJS	Telephone conference with Joshua M. Smith regarding Jury Instructions		
2/22/22	SJS	Email Pierce decisions to Joshua M. Smith		
2/22/22	SJS	Identify issues, make redline of Defendant's Jury Instructions		
2/22/22	SJS	Telephone conference with Joshua M. Smith regarding Pretrial tomorrow		
2/23/22	JKP	Locating, compiling, and organizing plaintiff's exhibits		
2/23/22	JKP	Updating plaintiff exhibit list		
2/23/22	JKP	Updating joint exhibits		
2/23/22	JKP	Updating defendants' exhibits		
2/23/22	JMS	Prepare for and attend final pretrial conference		
2/23/22	JMS	Draft damages proposal and stipulations; Correspondence to Peter A. Saba and Matthew D. Soaper regarding the same		
2/23/22	JMS	Draft cross-examination of Rana Schiff		
2/23/22	JMS	Review of joint exhibit list revisions; Correspondence with opposing counsel regarding the same		
2/23/22	JMS	Conference with Peter A. Saba regarding trial preparation and voir dire		
2/23/22	JMS	Review of performance evaluations produced late		
2/23/22	MDS	Continue to prepare motion in limine to exclude newly produced documents		
2/23/22	MDS	Attend the pretrial hearing		
2/23/22	MDS	Phone conversation with Sharon J. Sobers regarding motion in limine		
2/23/22	MDS	Conduct legal research on the exclusion of subsequent remedial measures		

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2/23/22	PAS	Prepare for and attend the Pre-Trial		
2/23/22	PAS	Receipt and review of correspondence from the Court		
2/23/22	PAS	Receipt and review of correspondence from opposing counsel regarding joint exhibits		
2/23/22	PAS	Review of settlement proposal		
2/23/22	SJS	Attend Pretrial Conference		
2/23/22	SJS	Review Matthew D. Soaper's Motion in Limine, telephone conference with Matthew D. Soaper regarding Motion in Limine, draft outline of discussion with Matthew D. Soaper at Matt's request		
2/24/22	JKP	Updating defendants' exhibits		
2/24/22	JKP	Locating, compiling, and organizing plaintiffs' exhibits		
2/24/22	JMS	Review of draft objections to jury instructions; Draft revisions to the same		
2/24/22	JMS	Prepare cross-examination of Rana Schiff		
2/24/22	JMS	Review of motion in limine regarding late produced documents; Correspondence to Sharon J. Sobers and Matthew D. Soaper regarding the same		
2/24/22	JMS	Draft correspondence to defendant's counsel regarding damages stipulations and settlement proposal; Correspondence to Peter A. Saba and Sharon J. Sobers regarding the same; Draft revisions		
2/24/22	JMS	Correspondence to named plaintiffs regarding damages proposal; Correspondence to opposing counsel; Telephone conference with opposing counsel		
2/24/22	JMS	Legal research regarding liquidated damages		
2/24/22	MDS	Continue to prepare motion in limine regarding recently produced documents		
2/24/22	MDS	Review damages spreadsheet and settlement letter		
2/24/22	MDS	Continue to conduct legal research on subsequent remedial measures		
2/24/22	PAS	Review and revise the settlement proposal; Conference with Josh M. Smith regarding revisions to the settlement demand; Finalize the settlement demand		

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2/24/22	SJS	Continue work on Response to Defendants' Jury Instructions that do not require legal research, email proposed response to Joshua M. Smith		
2/24/22	SJS	Review Matthew D. Soaper's Motion in Limine to preclude recently produced Kroger documents		
2/24/22	SJS	Legal research regarding liquidated damages under Ohio law		
2/24/22	SJS	Legal research regarding Defendant's willfulness instruction		
2/24/22	SJS	Telephone conference with Joshua M. Smith regarding response to Defendant's Jury Instructions		
2/25/22	JKP	Locating, compiling, and organizing plaintiffs' exhibits		
2/25/22	JKP	Calling plaintiffs to schedule time to meet with Josh M. Smith and Matthew D. Soaper for trial prep		
2/25/22	JKP	Drafting subpoenas for Kroger management personnel to be called at trial		
2/25/22	JMS	Review and revise motion in limine regarding performance evaluations; Conference with Sharon J. Sobers and Matthew D. Soaper regarding revisions		
2/25/22	JMS	Telephone conference with Matthew D. Soaper and Sharon J. Sobers regarding motions in limine		
2/25/22	JMS	Conference with Peter A. Saba regarding damages and liquidated damages; Conference with Sharon J. Sobers regarding the same		
2/25/22	JMS	Legal research regarding Ohio wage claims and damages calculations		
2/25/22	JMS	Telephone conference with opposing counsel regarding damages stipulations		
2/25/22	JMS	Correspondence to named plaintiffs regarding damages proposal		
2/25/22	JMS	Correspondence to opposing counsel		
2/25/22	MDS	Continue to prepare motions in limine		
2/25/22	MDS	Trial preparation meeting with Sharon J. Sobers and Josh M. Smith regarding motions in limine		
2/25/22	MDS	Conduct legal research surrounding collective action members		
2/25/22	MDS	Conduct legal research on 30(b)(6) designations at trial		

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2/25/22	PAS	Conference with Josh M. Smith regarding calculation of liquidated damages and additional motions in limine		
2/25/22	SJS	Review Monahan briefing regarding Ohio wage law claims		
2/25/22	SJS	Telephone conference with Joshua M. Smith, Matthew D. Soaper regarding Ohio liquidated damage calculation		
2/25/22	SJS	Draft Plaintiffs' responses to Defendant's Jury Instructions regarding, Primary Duty, Administrative Exemption, Representative Testimony, and Questions of Law/Fact, email Finalized Responses to Joshua M. Smith		
2/25/22	SJS	Telephone conference with Joshua M. Smith, Matthew D. Soaper regarding Motions in Limine that are needed		
2/27/22	JMS	Revise and revise objections to defendant's proposed jury instructions and verdict form; Legal research regarding the same; Correspondence to Matthew D. Soaper and Sharon J. Sobers regarding the same		
2/27/22	JMS	Receipt and review of revised motion in limine pertaining to late produced documents; Correspondence with Matthew D. Soaper and Sharon J. Sobers regarding the same		
2/27/22	JMS	Review and revise draft motion in limine pertaining to late-produced documents; Correspondence to Matthew D. Soaper and Sharon J. Sobers regarding the same		
2/27/22	JMS	Draft motion in limine pertaining to employee discipline; Legal research regarding the same		
2/27/22	MDS	Continue to prepare motions in limine		
2/27/22	PAS	Review and revise the objections to the jury instructions		
2/28/22	JKP	Drafting subpoenas for Kroger management personnel to be called at trial		
2/28/22	JKP	Locating, compiling, and organizing plaintiffs' exhibits		
2/28/22	JKP	Drafting an affidavit for a motion in limine		
2/28/22	JKP	Editing, formatting, filing, and serving objections to defendants' proposed jury instructions and motions in limine		
2/28/22	JMS	Review and revise objections to defendant's proposed jury instructions; Conference with Sharon J. Sobers regarding the same; Conference with Peter A. Saba regarding the same		

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2/28/22	JMS	Review and revise motions in limine x3; Conference with Matthew D. Soaper regarding the same; Conference with Sharon J. Sobers regarding the same		
2/28/22	JMS	Receipt and review of defendant's motion in limine; Receipt and review of defendant's objections to plaintiff's proposed jury instructions, and supplemental instruction; Correspondence to Matthew D. Soaper, Sharon J. Sobers, and Peter A. Saba regarding the same		
2/28/22	JMS	Review of deposition of Derek Chipman in preparation for client meeting; Draft deposition summary and direct exam practice questions		
2/28/22	MDS	Continue to prepare motions in limine		
2/28/22	MDS	Continue to prepare motions in Limine		
2/28/22	MDS	Conduct legal research on collective action members opting out		
2/28/22	PAS	Receipt and review of correspondence from the Court x4		
2/28/22	PAS	Conference with Josh M. Smith regarding changes to the Jury instruction objections		
2/28/22	SJS	Review Joshua M. Smith revisions to Responses to Defendant's Proposed Jury Instructions, review revisions to Motion in Limine regarding Defendant's recent document production, forward redlines to Joshua M. Smith		
2/28/22	SJS	Conference with Joshua M. Smith in office regarding jury instructions, motions in limine, time records, tasks for trial		
2/28/22	SJS	Review Motion in Limine regarding Disciplinary Actions, review Joshua M. Smith revisions to Plaintiffs' Responses to Defendant's Jury Instructions, telephone conference with Joshua M. Smith regarding redline of Plaintiff's Responses to Defendant's Jury Instructions, telephone conference with Joshua M. Smith regarding trial thesis		
3/01/22	JKP	Compiling a binder of Derek Chipman's deposition materials		
3/01/22	JMS	Prepare for and attend trial preparation session with Derek Chipman; Draft memo to file regarding the same		
3/01/22	JMS	Telephone conference with opposing counsel regarding settlement; Correspondence with Peter A. Saba regarding the same; Review and revise correspondence to opposing counsel regarding offer of settlement		

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3/01/22	JMS	Legal research regarding class certification denial and reconsideration/appeal		
3/01/22	JMS	Review of deposition transcript of Joseph Hardesty in preparation for trial		
3/01/22	JMS	Correspondence with the court regarding update to settlement discussions		
3/01/22	MDS	Prepare for trial preparation regarding Derek Chipman		
3/01/22	MDS	Participate in trial preparation for Derek Chipman with Josh M. Smith		
3/01/22	MDS	Conduct legal research regarding company policies surrounding overtime as they relate to FLSA		
3/01/22	MDS	Transcribe notes from Derek Chipman trial preparation		
3/01/22	PAS	Receipt and review of correspondence from the Court		
3/01/22	PAS	Conference with Josh M. Smith regarding response to settlement issues and terms of the settlement demand		
3/01/22	PAS	Review of parameters of settlement demand		
3/01/22	PAS	Receipt and review of correspondence from opposing counsel		
3/01/22	SJS	Work on Trial Brief		
3/01/22	SJS	Exchange emails with Joshua M. Smith regarding settlement letter		
3/02/22	JKP	Searching for Briana Whitlow and Chris Weiler contact information on Lexis		
3/02/22	JKP	Compiling a binder of Joseph Hardesty's deposition materials		
3/02/22	JKP	Formatting settlement letter		
3/02/22	JKP	Meeting with Matthew D. Soaper and Josh M. Smith regarding subpoenas and client interviews		
3/02/22	JKP	Preparing trial subpoenas for Briana Whitlow and Chris Weiler		
3/02/22	JKP	Compiling a binder of Kroger training materials produced in discovery		
3/02/22	JMS	Correspondence with Joseph Hardesty regarding deposition transcript and review of same		
3/02/22	JMS	Correspondence to Corbin Hom regarding trial preparation		

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3/02/22	JMS	Draft and revise settlement correspondence to opposing counsel; Conference with Peter A. Saba regarding the same		
3/02/22	JMS	Review of deposition transcript of Joe Hardesty in preparation for meeting with client		
3/02/22	JMS	Review of plaintiff's exhibits in preparation for opening statements; Begin drafting of same		
3/02/22	JMS	Review and revise subpoena cover letter to Briana Whitlow; Correspondence to Matthew D. Soaper regarding the same		
3/02/22	JMS	Telephone conference with Sharon J. Sobers regarding issues pertaining to class certification and settlement		
3/02/22	JMS	Draft and revise cross-examination of Rana Schiff		
3/02/22	JMS	Legal research regarding class representative awards in FLSA litigation		
3/02/22	JMS	Telephone conference with Joseph Hardesty regarding deposition		
3/02/22	MDS	Prepare for trial preparation regarding Joseph Hardesty; Prepare subpoena cover letter for Briana Whitlow and Chris Weiler; Conduct research regarding federal subpoenas		
3/02/22	MDS	Prepare subpoena cover letter for Briana Whitlow and Chairs Weiler		
3/02/22	MDS	Conduct research regarding federal subpoenas		
3/02/22	PAS	Review and revise the settlement demand		
3/02/22	PAS	Conference with Josh M. Smith regarding issues with allocations of service fee to named plaintiffs		
3/02/22	PAS	Receipt and review of correspondence from opposing counsel regarding witnesses present at trial and subpoenas		
3/02/22	SJS	Telephone conference with Joshua M. Smith, two times regarding settlement, telephone conference with John Marshall, OELA attorney in Columbus, regarding putting award for Named Plaintiffs in Settlement Demand		
3/02/22	SJS	Read Clarke v Baptist Memorial Hospital, Kirsh, legal research regarding Intervention to appeal denial of 23(b) class certification		
3/03/22	JKP	Formatting and sending trial subpoenas to Briana Whitlow and Chris Weiler		
3/03/22	JKP	Creating and updating settlement memo		

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3/03/22	JKP	Labeling and organizing documents for trial		
3/03/22	JMS	Prepare for and attend witness preparation session with Amanda Gayhart and Rhonda Furr; Conference with Matthew D. Soaper regarding the same		
3/03/22	JMS	Draft opening argument		
3/03/22	JMS	Draft memorandum in opposition to Kroger motion in limine pertaining to re-classification decision; Legal research regarding same; Correspondence to Sharon J. Sobers and Matthew D. Soaper regarding the same		
3/03/22	JMS	Correspondence with named plaintiffs regarding conference call and settlement discussions		
3/03/22	JMS	Telephone conference with opposing counsel regarding response to settlement demand; Telephone conference with Peter A. Saba and Sharon J. Sobers regarding the same; Draft settlement memo regarding responsive offer; Draft proposed response		
3/03/22	JMS	Conference with Matthew D. Soaper regarding potential contact with Laurie White and ethical issues surrounding same; Receipt and review of memo from Matthew D. Soaper regarding communications with employees and witnesses of opposing party		
3/03/22	MDS	Prepare for trial preparation regarding Amanda Gayhart and Rhonda Furr		
3/03/22	MDS	Participate in trial preparation for Amanda Gayhart and Rhonda Furr with Josh M. Smith		
3/03/22	MDS	Transcribe notes from Amanda Gayhart and Rhonda Furr trial preparation		
3/03/22	MDS	Conduct legal research on the ability to contact the opposing party's witness		
3/03/22	MDS	Conduct legal research on the ability to sequester a plaintiff		
3/03/22	PAS	Review and revise the settlement demand for opposing counsel; Conference with Josh M. Smith and Sharon J. Sobers regarding terms of counter proposal; Conference with Jeffrey G. Stagnaro regarding issues with the counter proposal		

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Date	Int	Professional Services	Hours	Amount
3/03/22	SJS	Review/revise Memo regarding Intervention to appeal denial of 23(b) class action certification/Appeal by settling named Plaintiffs to protect attorney fees, forward Memo regarding Intervention/Appeal following settlement to Joshua M. Smith		
3/03/22	SJS	Telephone conference with Joshua M. Smith regarding settlement, telephone conference with Joshua M. Smith, Peter A. Saba regarding settlement		
3/03/22	SJS	Forward Chip Amann Voire Dire to Joshua M. Smith		
3/04/22	JKP	Labeling and organizing documents for trial		
3/04/22	JKP	Proofreading and formatting motions in limine		
3/04/22	JMS	Draft objections to defendants' supplemental jury instruction; Legal research regarding the same, including fluctuating workweek method		
3/04/22	JMS	Prepare for and attend telephone conference with named plaintiffs and Peter A. Saba regarding settlement discussions		
3/04/22	JMS	Conference with Matthew D. Soaper regarding opposition to defendants' motion in limine regarding Kroger policy on overtime		
3/04/22	JMS	Conference with Matthew D. Soaper regarding correspondence and communications with opt-ins regarding trial preparation		
3/04/22	JMS	Conference with Matthew D. Soaper and Jessica K. Peterson regarding subpoenas and service of same		
3/04/22	JMS	Review and revise order of witnesses for trial; Preparation surrounding direct exam questions for opt-ins		
3/04/22	MDS	Prepare for trial preparation meeting with Rondalyn West		
3/04/22	MDS	Phone call with Christopher Wieler regarding witness subpoena		
3/04/22	MDS	Phone conversation with Ohio Ethics Board regarding Laurie White		
3/04/22	MDS	Phone call with Rondalyn West regarding testifying at trial		
3/04/22	MDS	Prepare a response to Kroger's Motion in Limine		
3/04/22	PAS	Conference call with all named plaintiffs to review current settlement posture and settlement strategy; Conference with Josh M. Smith regarding settlement parameters		
3/04/22	SJS	Further review of Trial Brief, legal research regarding Sixth Circuit cases analyzing CFR 541.202(b)		

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3/04/22	SJS	Add Novartis material to Trial Brief		
3/04/22	SJS	Add other Sixth Circuit case addressing CFR 541.202 to Trial Brief		
3/05/22	JMS	Revise memorandum in opposition to defendant's motion in limine; Correspondence to Sharon J. Sobers and Matthew D. Soaper regarding the same		
3/05/22	JMS	Draft and revise objections to defendants' requested supplemental jury instruction, and memorandum in support; Correspondence to Sharon J. Sobers, Peter A. Saba, and Matthew D. Soaper regarding the same		
3/05/22	JMS	Correspondence to Jessica K. Peterson regarding juror questionnaires and responses, and requesting same; Review of court standing order pertaining to same		
3/05/22	MDS	Continue to prepare motion in opposition to Kroger's Motion in Limine		
3/05/22	SJS	Add section on Perry v Randstad to Trial Brief		
3/05/22	SJS	Draft section of Trial Brief regarding other factors affecting Administrative Exemption analysis		
3/05/22	SJS	Legal research regarding cases addressing 29 CFR 541.202(e)		
3/05/22	SJS	Review 23(b) certification argument for Trial Brief		
3/05/22	SJS	Review/revise Trial brief after review of McFarland decision on summary judgment		
3/06/22	JMS	Review and revise memorandum in opposition to motion in limine; Legal research regarding the same		
3/06/22	JMS	Review of exhibits in preparation for trial; Draft order of witnesses		
3/06/22	JMS	Preparation and revisions to opening statements for trial		
3/07/22	JGS	Telephone conference with Peter A. Saba regarding settlement negotiations		
3/07/22	JKP	Updating the documents in the binder for Kroger training materials		
3/07/22	JKP	Proofreading, formatting, and filing motions in limine and response to supplemental jury instruction		
3/07/22	JKP	Labeling and reorganizing the joint exhibits for trial		
3/07/22	JKP	Drafting a notice of service of subpoena for Chris Weiler		

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3/07/22	JMS	Revise correspondence to opposing counsel regarding counterdemand; Conference with Peter A. Saba regarding the same; Correspondence to opposing counsel regarding counterdemand		
3/07/22	JMS	Review and revise memorandum in opposition to Kroger motion in limine		
3/07/22	JMS	Revise objections to defendants' supplemental proposed jury instructions		
3/07/22	JMS	Review of draft trial brief; Correspondence to Sharon J. Sobers regarding the same		
3/07/22	JMS	Telephone conference with Peter A. Saba regarding settlement counteroffer and response		
3/07/22	JMS	Review of deposition of Matt Taske in preparation for witness session		
3/07/22	JMS	Travel to and review of courtroom technology in preparation for trial		
3/07/22	JMS	Receipt and review of Kroger's memorandum in opposition to motions in limine		
3/07/22	MDS	Prepare demonstrative exhibits for trial		
3/07/22	MDS	Prepare stipulations to exhibits		
3/07/22	MDS	Prepare updated exhibit list		
3/07/22	MDS	Prepare an email to Corbin Hom regarding trial		
3/07/22	MDS	Prepare for Matt Taske trial preparation		
3/07/22	PAS	Review and revise the settlement demand counter to opposing counsel; Receipt and review of correspondence from opposing counsel regarding settlement offer; Conference with Josh M. Smith regarding settlement proposal response; Conference with Jeffrey G. Stagnaro regarding settlement response		
3/07/22	SJS	Review/revise Trial Brief draft, forward draft to Joshua M. Smith		
3/07/22	SJS	Email Joshua M. Smith setting forth comments on our response/objections to the Defendant's Request for Supplemental Jury Instruction regarding fluctuating workweek		
3/08/22	JGS	Review of correspondences regarding settlement negotiations; telephone calls with Peter A. Saba regarding settlement negotiations		
3/08/22	JKP	Compiling and organizing plaintiffs' exhibits and putting them in binders for trial		

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3/08/22	JMS	Prepare for and attend trial preparation session with Madeline Hickey		
3/08/22	JMS	Draft and revise opening argument, voir dire questions		
3/08/22	JMS	Multiple conferences with Peter A. Saba and named reps regarding settlement discussions		
3/08/22	JMS	Review of Joseph Hardesty deposition transcript		
3/08/22	MDS	Continue to prepare demonstrative exhibits for trial		
3/08/22	MDS	Prepare for trial preparation meeting with Madeline Hickey		
3/08/22	MDS	Trial preparation meeting with Madeline Hickey		
3/08/22	MDS	Continue to prepare stipulated exhibits list		
3/08/22	PAS	Conference with Josh M. Smith regarding parameters of settlement proposal; Review and revise the settlement calculation; Review of exhibits for admissibility stipulation issues; Receipt and review of correspondence from opposing counsel regarding settlement negotiations; Conference with Jeffrey G. Stagnaro regarding settlement		
3/08/22	SJS	Review Monroe I, Canady, Garcia, and Trial Brief draft, start drafting representative evidence section of Trial Brief regarding liability, i.e. does jury make a decision regarding whether Plaintiffs are "similarly situated"		
3/09/22	JGS	Review of correspondence regarding settlement negotiations: telephone conference with Peter A. Saba regarding settlement negotiations		
3/09/22	JKP	Compiling and organizing plaintiffs' exhibits and putting them in binders for trial		
3/09/22	JKP	Compiling and organizing joint exhibits and putting them in binders for trial		
3/09/22	JKP	Travelling and giving the exhibit binders to the Court		
3/09/22	JMS	Prepare for and attend witness preparation session with Joe Hardesty and Matthew D. Soaper		
3/09/22	JMS	Review of trial brief; Conference with Sharon J. Sobers regarding the same; Draft revisions to same		
3/09/22	JMS	Conferences with Peter A. Saba and named representatives regarding settlement negotiations		

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3/09/22	JMS	Prepare for and attend witness preparation session with Kelly Rutledge; Conference with Matthew D. Soaper regarding the same		
3/09/22	JMS	Prepare and revise cross exam of Buck Moffett; Review of Moffett deposition		
3/09/22	JMS	Review of exhibits; Conference with Jessica K. Peterson regarding additional/revised exhibits, including badge ID swipes		
3/09/22	MDS	Continue to prepare demonstrative exhibits		
3/09/22	MDS	Prepare for trial preparation with Joe Hardesty		
3/09/22	MDS	Conduct trial preparation with Joe Hardesty		
3/09/22	MDS	Deliver exhibits to the federal courthouse		
3/09/22	MDS	Prepare a letter for Rhonda Furr regarding her testimony at trial for her employer		
3/09/22	MDS	Prepare for trial preparation with Kelly Rutledge		
3/09/22	MDS	Conduct trial preparation with Kelly Rutledge		
3/09/22	PAS	Conference with Jeffrey G. Stagnaro regarding summary of past settlement negotiations and next response; Conference with Josh M. Smith regarding issues with settlement negotiations and break down of the settlement; Receipt and review of correspondence from opposing counsel x3 regarding deposition exhibits, settlement; Receipt and review of correspondence from the Court		
3/09/22	SJS	Draft and revise Trial Brief section arguing that jury does not make decision that plaintiffs are "similarly situated"		
3/09/22	SJS	Finish section of Trial Brief regarding using representative evidence to determine damages		
3/09/22	SJS	Draft section of Trial Brief on reviving 23(b) class certification, telephone conference with Joshua M. Smith regarding moving up the time to file Reply Brief, email draft of Trial Brief to Joshua M. Smith		
3/10/22	JKP	Compiling and organizing defendants' exhibits and putting them in binders for trial		
3/10/22	JKP	Meeting with Peter A. Saba regarding trial preparations and details		
3/10/22	JKP	Obtaining the jury questionnaires from the jury commissioner		
3/10/22	JKP	Proofreading, formatting, filing, and serving trial brief		

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3/10/22	JMS	Review and revise trial brief		
3/10/22	JMS	Review of exhibits and related documents in preparing opening		
3/10/22	JMS	Follow-up client preparation meeting/phone conference with Joe Hardesty		
3/10/22	JMS	Conference with Peter A. Saba and Jessica K. Peterson regarding issues related to evidence introduction and overcoming directed verdict motions; Conference with Jessica K. Peterson regarding evidence charts		
3/10/22	JMS	Review and revise cross-exam of Rana Schiff		
3/10/22	JMS	Review and revise stipulations to exhibits and damages; Correspondence to opposing counsel regarding the same		
3/10/22	MDS	Prepare charts for trial regarding elements of plaintiff and defendants claims		
3/10/22	MDS	Prepare for trial preparation with Kim Burchett		
3/10/22	MDS	Prepare for trial preparation with Matt Taske		
3/10/22	MDS	Prepare Matt Taske for trial		
3/10/22	PAS	Conference with Jessica K. Peterson regarding charts needed for voir dire, exhibits, directed verdict		
3/10/22	PAS	Conference with Josh M. Smith regarding stipulations settlement issues		
3/10/22	PAS	Conference with Sharon J. Sobers regarding breakdown of elements for directed verdict and Rule 23 (b) class		
3/10/22	PAS	Receipt and review of correspondence from the Jury commissioner		
3/10/22	PAS	Review of Jury questionnaires with Josh M. Smith		
3/10/22	SJS	Telephone conference with Joshua M. Smith regarding Trial Brief, Kroger Job Description indicating recruiter job is a management position		
3/11/22	JGS	Telephone conferences with Peter A. Saba regarding settlement negotiations		
3/11/22	JKP	Compiling and organizing plaintiffs' exhibits and putting them in binders for trial		
3/11/22	JKP	Compiling and organizing joint exhibits and putting them in binders for trial		

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Date	Int	Professional Services	Hours	Amount
3/11/22	JMS	Multiple telephone conferences and correspondence with co-counsel, class reps regarding settlement negotiations		
3/11/22	JMS	Draft voir dire questions; Draft and revise opening		
3/11/22	JMS	Travel to courtroom and test equipment/technology		
3/11/22	JMS	Conference with opt-in Corbin Hom in preparation for trial		
3/11/22	MDS	Continue to prepare charts for trial		
3/11/22	MDS	Place phone calls to witnesses reminding them of the day they should attend trial and phone calls advising witnesses of settlement		
3/11/22	PAS	Receipt and review of correspondence from opposing counsel x4 regarding settlement; Telephone conference with opposing counsel x8 regarding settlement negotiations; Conference with Josh M. Smith regarding settlement negotiations; Conference with Jeffrey G. Stagnaro regarding settlement negotiations; Review and revise the allocation of settlement with each demand; Receipt and review of correspondence from the court; Revise and complete the allocation of final settlement; Correspondence to opposing counsel x2		
3/14/22	JMS	Telephone conference with opposing counsel regarding settlement and contact with court regarding conditional dismissal; Telephone conference with Peter A. Saba regarding the same		
3/14/22	JMS	Telephone conference with the client regarding settlement and next steps		
3/14/22	PAS	Conference with Josh M. Smith regarding settlement procedure and next steps for completing the case		
3/15/22	MDS	Call Amanda Gayhart to discuss updates to the settlement		
3/15/22	PAS	Receipt and review of correspondence from the court; Receipt and review of correspondence from opposing counsel		
3/16/22	MDS	Prepare correspondence to class members regarding the case settlement		
3/17/22	JMS	Review of attorney's fees legal research and approval of fee awards		
3/22/22	JMS	Review and revise draft settlement agreement		
3/22/22	PAS	Receipt and review of correspondence from opposing counsel regarding proposed settlement agreement		
3/23/22	JMS	Review and revise draft settlement agreement; Correspondence to Peter A. Saba regarding the same		

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Date	Int	Professional Services	Hours	Amount
3/26/22	JMS	Receipt and review of Peter A. Saba revisions to proposed settlement agreement		
3/26/22	PAS	Review and revise the proposed settlement agreement; Conference with Josh M. Smith regarding changes to the settlement agreement		
3/27/22	PAS	Conference with Jeffrey G. Stagnaro regarding issues with settlement agreement and petition for attorney fees		
3/28/22	JMS	Revise correspondence to class members regarding settlement; Correspondence to Jessica K. Peterson regarding the same		
3/28/22	JMS	Legal research regarding FLSA settlement and fee petitions; Conference with Matthew D. Soaper regarding the same		
3/29/22	JKP	Formatting and sending out correspondence to plaintiffs regarding settlement details		
3/29/22	JMS	Legal research regarding fee petitions in FLSA litigation; Conference with Matthew D. Soaper regarding the same; Receipt and review of memo regarding the same		
3/29/22	JMS	Telephone conference with the client regarding status update		
3/29/22	MDS	Conduct legal research regarding attorneys fees relating to a settlement agreement		
3/30/22	MDS	Continue to conduct legal research regarding attorneys fees; Prepare memorandum of finding		
3/30/22	SJS	Quick review of Hardesty/Kroger settlement agreement draft, email Joshua M. Smith regarding "cy pres award"		
3/31/22	SJS	Review Hardesty/Kroger Settlement Agreement, email Joshua M. Smith regarding Agreement		
4/01/22	JMS	Receipt and review of correspondence from Sharon J. Sobers regarding settlement agreement and revisions to same		
4/06/22	JMS	Draft revisions to settlement agreement; Correspondence to Peter A. Saba regarding the same		
4/06/22	PAS	Conference with Josh M. Smith regarding additional revisions to the settlement agreement		
4/09/22	PAS	Review and finalize the proposed settlement agreement; Conference with Josh M. Smith regarding final changes to the settlement agreement and communication to opposing counsel		

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Date	Int	Professional Services	Hours	Amount
4/10/22	JMS	Receipt and review of Peter A. Saba revisions to settlement agreement; Draft additional revisions to the same		
4/11/22	JMS	Review and revise settlement agreement; Correspondence to opposing counsel regarding the same; Review of fees in preparation for submission of attorney's fee petition		
4/11/22	PAS	Conference with Josh M. Smith regarding review of final changes to settlement agreement		
4/19/22	SJS	Pick up Hardesty FLSA Time Records at Office		
4/19/22	SJS	Review Hardesty FLSA time records		
4/20/22	PAS	Receipt and review of correspondence from opposing counsel regarding response to changes to the Settlement Agreement		
4/20/22	SJS	Review Hardesty FLSA Time Records		
4/21/22	SJS	Review Hardesty FLSA Time Records		
4/22/22	SJS	Review Hardesty FLSA Time Records		
4/22/22	SJS	Review Hardesty Settlement Agreement one more time		
4/23/22	SJS	Finish Initial Review of Hardesty FLSA attorney time		
4/23/22	SJS	Review corrections to Hardesty FLSA attorney time review to assure corrections can be followed		
4/23/22	SJS	Draft comments on the review of Hardesty FLSA attorney time		
4/25/22	JMS	Receipt and review of correspondence from Sharon J. Sobers regarding draft bills and revisions to time entries		
4/25/22	PAS	Conference with Josh M. Smith and Sharon J. Sobers regarding review of changes to legal bills for attorneys fees application and settlement agreement		
4/25/22	SJS	Finish review of Hardesty Settlement Agreement		
4/25/22	SJS	In office conference with Peter A. Saba, Joshua M. Smith, Amy Messer regarding Hardesty FLSA attorney time; End of Job; Monahan litigation regarding working through meal breaks.		
4/26/22	SJS	Review Amy L. Messer's comments/questions on Hardesty FLSA attorney time		

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Date	Int	Professional Services	Hours	Amount
4/27/22	JMS	Review of time entries for purposes of fee petition; Correspondence to Amy L. Messer, Sharon J. Sobers, and Peter A. Saba regarding the same		
4/28/22	MDS	Prepare and send an email to Amanda Gayhart regarding the status of the case		
4/28/22	PAS	Conference with James A. Stagnaro regarding issues with hours review		
4/29/22	JMS	Review of draft bills for purposes of fee petition; Conference with Sharon J. Sobers regarding the same		
4/29/22	JMS	Correspondence to the named plaintiffs regarding release of claims and confirmation; Telephone conference with named plaintiffs regarding the same		
4/29/22	PAS	Review and revise the settlement agreement; Review and revise information for the attorney fee petition; Conference with Josh M. Smith regarding issues with information for Attorney fee petition		
5/03/22	PAS	Receipt and review of correspondence from the Court regarding settlement status; Conference with Josh M. Smith regarding status of settlement agreement and motion for approval		
5/04/22	PAS	Receipt and review of correspondence from opposing counsel x3 regarding final version of settlement agreement and contact with the court; Receipt and review of correspondence from the court		
5/05/22	PAS	Receipt and review of correspondence from opposing counsel x2 regarding presentation to the court; Conference with Josh M. Smith regarding issues with the court		

Professional Services

Date	Expenses	Amount
1/27/16	Certified Mail	
2/09/16	Filing Fee	
2/10/16	Certified Mail	
2/22/16	UPS/FEDEX Shipping Charge	
8/04/16	FLSA phone line set-up	
11/02/16	Deposit	

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Date	Expenses	Amount
11/30/16	Parking/Travel	
12/05/16	Deposition Invoice	
12/16/16	Parking/Travel	
12/21/16	Appearance Fee	
12/30/16	Court Reporter	
1/06/17	Transcript Invoice	
1/13/17	Transcript Invoice	
1/31/17	Class Action Web Page	
2/08/17	Attendance Fee	
4/25/17	Parking/Travel	
4/25/17	Parking/Travel	
4/30/17	Mileage	
5/25/17	Parking/Travel	
5/26/17	Parking/Travel	
5/26/17	Transcript Invoice	
6/08/17	Transcript Invoice	
6/08/17	Transcript Invoice	
6/09/17	Transcript Invoice	
6/13/17	Transcript Invoice	
6/16/17	Appearance Fee	
7/21/17	Transcript Invoice - Matt Taske	
7/21/17	Transcript Invoice	
1/26/22	Monthly Mail and Document Reproduction	
2/23/22	Parking/Travel	
3/03/22	Courier Fees	
3/03/22	B. Kenneh attendance and trial and mileage	

Stagnaro, Saba & Patterson Co., L.P.A.

Hardesty, Joseph
FLSA

May 24, 2022
Invoice #: 790903

Date	Expenses	Amount
3/03/22	C. Weiler attendance at trial and mileage	
3/10/22	Parking/Travel	
3/11/22	Document Reproduction	
3/11/22	Binder costs for trial	
4/15/22	Legal Research	
Total Expenses		
Total This Invoice		

PROVIDED FOR SETTLEMENT PURPOSES ONLY AND INADMISSIBLE UNDER RULE 408

Employee	Salary	Regular Rate (Salary 2080)	OT Rate (Reg. Rate x 1.5)	Start/Change Date	End Date	Weeks of Employment	Scheduled OT Calculation	Weeks of Additional Overtime	Unscheduled OT Calculation	Total Back Wages Owed	Liquidated Damages	Total	Settlement Amount	Settlement Payment to each Class Member
Alexandra Cooper	\$			3/16/2015	7/31/2015	20		16						
Alexandra Cooper w/ 2015 Merit	\$			8/1/2015	7/26/2016	51		51						
Amanda Gayhart	\$			2/23/2015	7/31/2015	23		18						
Amanda Gayhart w/2015 Merit	\$			8/1/2015	12/30/2015	22		15						
Christian Bradley	\$			3/16/2015	6/9/2015	12		8						
Chris Matibiri	\$			2/23/2015	7/31/2015	23		19						
Chris Matibiri w/ 2015 Merit	\$			8/1/2015	11/24/2015	16		16						
Corbin Hom	\$			6/27/2016	12/1/2016	22		20						
Craig McIntyre	\$			3/16/2015	7/31/2015	20		16						
Craig McIntyre w/ 2015 Merit	\$			8/1/2015	5/7/2016	40		40						
Curtis Flint	\$			7/6/2015	11/24/2015	20		18						
Derek Chipman	\$			2/23/2015	7/31/2015	23		19						
Derek Chipman w/ 2015 Merit	\$			8/1/2015	8/7/2015	1		1						
Dominic Martin	\$			11/10/2014	1/28/2015	11		11						
Jacob Cress	\$			7/20/2015	7/31/2016	54		50						
Jacob Cress w/ 2016 Merit	\$			8/1/2016	8/29/2016	4		4						
Jalen Johnson	\$			4/11/2016	7/31/2016	16		14						
Jalen Johnson w/ 2016 Merit	\$			8/1/2016	12/1/2016	17		17						
Jeremy Hadden	\$			2/23/2015	7/20/2015	21		17						
Jessica Conroy	\$			2/23/2015	7/31/2015	23		19						
Jessica Conroy w/ 2015 Merit	\$			8/1/2015	7/31/2016	52		52						
Jessica Conroy w/ 2016 Merit	\$			8/1/2016	12/1/2016	17		17						
Joseph Hardesty	\$			2/23/2015	7/31/2015	23		19						
Joseph Hardesty w/ 2015 Merit	\$			8/1/2015	9/14/2015	6		6						
Kelly Rutledge	\$			2/23/2015	7/31/2015	23		15						
Kelly Rutledge w/ 2015 Merit	\$			8/1/2015	7/31/2016	52		44						
Kelly Rutledge w/ 2016 Merit	\$			8/1/2016	12/1/2016	17		17						
Kimberly Burchett	\$			11/3/2014	3/26/2015	20		20						
Latasha Moore	\$			2/23/2015	7/31/2015	23		19						
Latasha Moore w/ 2015 Merit	\$			8/1/2015	7/31/2016	52		52						
Latasha Moore w/ 2016 Merit	\$			8/1/2016	12/1/2016	17		17						
Lawanna Haskins1	\$			2/23/2015	6/30/2015	18		14						
Lawanna Haskins2	\$			9/19/2016	12/1/2016	10		10						
Madeline Hickey	\$			10/31/2014	4/1/2015	22		22						
Marcus LaCour	\$			2/23/2015	7/31/2015	23		19						
Marcus LaCour w/ 2015 Merit	\$			8/1/2015	7/31/2016	52		52						
Marcus LaCour w/ 2016 Merit	\$			8/1/2016	12/1/2016	17		17						
Marye Ward	\$			2/23/2015	7/31/2015	23		19						
Marye Ward w/ 2015 Merit	\$			8/1/2015	7/31/2016	52		50						
Marye Ward w/ 2016 Merit	\$			8/1/2016	12/1/2016	17		17						
Matt Taske	\$			2/23/2015	7/31/2015	23		19						
Matt Taske w/ 2015 Merit	\$			8/1/2015	7/31/2016	52		52						
Matt Taske w/ 2016 Merit	\$			8/1/2016	12/1/2016	17		17						
Michael Kovatch	\$			2/23/2015	7/31/2015	23		19						
Michael Kovatch w/ 2015 Merit	\$			8/1/2015	3/5/2016	31		31						
Rhonda Furr	\$			2/23/2015	7/31/2015	23		19						
Rhonda Furr w/ 2015 Merit	\$			8/1/2015	7/31/2016	52		52						
Rhonda Furr w/ 2016 Merit	\$			8/1/2016	12/1/2016	17		17						
Rondalyn West	\$			9/14/2015	7/31/2016	46		44						
Rondalyn West w/ 2016 Merit	\$			8/1/2016	12/1/2016	17		17						
Sara Elkins-Schumann	\$			11/3/2014	3/13/2015	19		19						
Wahid Lewis	\$			3/16/2015	7/31/2015	20		17						
Wahid Lewis w/ 2015 Merit	\$			8/1/2015	7/31/2016	52		52						
Wahid Lewis w/ 2016 Merit	\$			8/1/2016	12/1/2016	17		17						
										Back Wages	Liquidated Damages	TOTAL		